

Rhetoric and Reality in US Immigration Policy

Borderscaping the Citizenship Grant Program

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<p>Tiivistelmä – Referat – Abstract</p> <p>This thesis examines rhetoric and reality in the Citizenship Grant Program (CGP), a program which allocates funding to community-based organizations that assist immigrants in becoming US citizens. The CGP is an area of US immigration policy which has gained consistent bipartisan support since its inception in 2009, yet has been unexamined in critical policy research. Using the CGP's main policy texts as data, I employ rhetorical analysis—unpacking the persuasive arguments of the program, how they are constructed, and how they construct citizens. Then, I examine what the rhetoric illustrates about US national identity and who is authorized to claim it.</p> <p>Throughout the research project, I am theoretically grounded in the concept of borderscaping, which emphasizes the performative aspect of constructing cultural borders. Over the course of the analysis, I observe that the CGP constructs arguments differently over time and space— depending on the political party of the governing presidential administration and its stance preference towards either the integration or the assimilation of immigrants. Yet, I also find that all iterations of the CGP construct certain immigrants as threats to social cohesion, seeking to weed out those who do not adhere the state's demands for model citizenship. With my findings, I connect the dots between rhetoric and the practical realities of naturalizing immigrants. I not only expose the existing power relations at play in former and existing iterations of the CGP, but highlight everyday peoples agency in borderscaping the future of the policy.</p>			
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1 Introduction

In an age of polarized politics, agreement can be hard to come by. Yet, across administrations and over party lines, one area of United States (US) immigration policy continues to garner consistent support—the Citizenship Grant Program (CGP¹). Started in 2009, the CGP is directed under the Department of Homeland Security (DHS), facilitated by US Citizenship and Immigration Services (USCIS), and promoted by the Office of Citizenship (OoC) (USCIS, February 18, 2021). Each year, it allocates funding to vetted community organizations who provide citizenship preparations services to eligible immigrants. Over the years, the program has been spread to communities across the US. It has awarded 513 grants totaling \$112 million, and allowed organizations to assist over 290,000 people with US citizenship acquisition.

I first became aware of the CGP around 2014 when I started to volunteer for a newly formed non-profit organization in rural Washington state. The non-profit provided immigrants with legal assistance pertaining to the application for citizenship and classes which trained students to pass their naturalization interview—what our staff commonly referred to as "the citizenship test". For a period of about three years, I worked wherever needed in the organization—from tutoring students to acting as administrative assistant, to fundraising and securing grants, and even serving as Board President. Over the course of my work, the organization was often strapped for money and on the hunt for funding. The CGP came across my radar as a potential funding source. In 2016, the organization considered applying to the CGP, however when looking into the details of the grant requirements we realized that receiving the grant would mean overhauling our entire programme—stipulating the content and pace of our services and the ways we tracked students and their progress. After advice from a grant professional, we decided not to apply for the federal funds, wanting to first establish our own best practices before deciding to adopt those required by the CGP.

With several more years of operation under our belts, in 2018 the non-profit looked into applying to the CGP again. Yet this time there was a requirement that would make the grant even trickier for our organization. No funding was allowed to go towards services

¹ The CGP has had slightly different names throughout the years of its operation. These will be discussed in detail later on, but whenever I refer to the grant program, in general, I will use this abbreviation, as it stems from its original name.

conducted in a language other than English. As an organization that prided itself on being multicultural and multilingual, this requirement would not only tiptoe around our values, but it would also turn away over half of our clients. In our organization, the legal and teaching staff conducted more than half of our services in Spanish. Spanish was the native language of the majority of our clients. In many cases—over a hundred per year—Spanish was the in which these immigrants were eligible to naturalize. This was based on English language exceptions in the naturalization process, determined by the fact that the clients were over the age of 50 and had been in the US with residence permit for over 20 years (See USCIS, June 5). Thus, my organization decided to not apply for the CGP and went forward, instead, with some state grant funding which was more flexible on how we conducted our services and who we provided services for.

Despite 11 years of bipartisan support, the CGP is a little known policy that flies under the radar of the general public. Through my work in an immigration services organization, I became aware of the grant program and also its changes over the years—changes which have affected which organizations can apply for funding and also the content of the funded services. In looking for a topic for my Master's thesis, I kept circling back to my work with US citizenship acquisition, pondering the borders at play within the CGP. I decided to explore this under-examined policy and its potential cultural implications, seeking to understand the CGP's stated aims, intended purpose, and embodied constructions.

1.1 Research Task

In this study, I build on existing critical scholarship in the political sphere, aiming a spotlight on an overlooked area of US immigration policy and examining it through rhetorical analysis (RA). This thesis is part of the degree requirements for the Master's of Arts in Intercultural Encounters— an interdisciplinary umbrella area that examines what takes place between or arises from cultures coming in contact with each other. Within this study area, migration is a topic of much interest. Thus, it is suitable to investigate the role of rhetoric in the process of moving from one state to another and in the process of acquiring cultural membership within a national community. Fitting with the area of Intercultural Encounters, this study is interdisciplinary as well. I draw on scholarship from communications, sociology, geopolitics, cultural studies, and several of their subdisciplines.

My theoretical framework stems from a critical paradigm where all meaning is understood to be both socially constructed and contextually bound, and where "culture is [considered] an ideological and power struggle" (Hua, 2016, p. 9²). Within this paradigm, I also recognize language as instrumental in political meaning-making (Winton 2013). Falling under the umbrella of discourse, rhetoric is considered the discursive practice of persuasion (Leach, 2000). Furthermore, rhetoric is not only understood as words but how words are crafted and performed, taking account of how their performance of them is situated in history. By unpacking rhetoric in the CGP's most dominant policy texts, my objective is to uncover the relationship between communication, power, culture, and identity in the CGP. To do this, I am guided by the following questions:

- What are the persuasive arguments in the CGP? How are the arguments constructed and how do they construct citizens?
- What does the rhetoric illustrate about US national identity and who is authorized to claim it?

1.2 Theoretical Background

The base of my theoretical framework stems from Critical Border Studies and applies a critical approach to the concept of borderscaping. In the article *Exploring the Critical Potential of the Borderscapes Concept*, Brambilla (2015) defines "*borderscaping* as practices through which fluctuating borders are imagined, materially established, experienced, lived as well as reinforced and blocked but also crossed, traversed and inhabited" (p. 30). They expand on work in Critical Border Studies which does not consider borders as only physical or as only territorial, but seeks to expose boundaries which may be less visible or recognized, yet still exhibit real consequences in daily life (Parker & Vaughan-Williams, 2009). Brambilla (2015) finds the term borderscapes, coined by Rajaram and Grundy-Warr (2007), to be compelling for several reasons. Brambilla (2015) says, borderscapes

express[es] the spatial and conceptual complexity of the border as a space that is not static but fluid and shifting; established and at the same time continuously traversed by a number of bodies, discourses, practices, and relationships that highlight endless

² In this quote Hua (2016) is referring to and expanding on the work of Nakayama & Halualani, 2010

definitions and shifts in definition between inside and outside, citizens and foreigners, hosts and guests across state, regional, racial, and other symbolic boundaries. (p. 19)

Yet, Brambilla (2015) applauds Strüver (2005) who first makes borderscapes a verb. In doing this, Strüver builds on the work of Butler (1999), emphasizing the performative aspect of constructing borders and the ways in which performative acts— such as rhetorical acts — reify or resist dominant discourse. In result, Strüver conceptualizes borderscaping "as the practice of doing the border" (p. 613) which, in turn, impacts the formation of the self and its relation to others. Brambilla (2015) believes Strüver's (2005) emphasis adds a crucial element to the concept, enhancing its ability to reveal power relations and their multifaceted impacts. Thus, by taking on a critical and performative approach to borderscaping, my research can "move beyond the often-criticised gap between practices and representations" (p. 28), connecting discursive performances to complex identities and livelihoods.

The concept of borderscaping allows me to examine rhetoric and reality in an intentional and thoughtful manner. Although rhetoric is often conceived— especially when considering political discourse— as empty words or the opposite of reality, scholarship has shown it does connect to practices that impact society on all levels (Kock & Villadsen, 2017). Thus, borderscaping provides a theoretical understanding that is carried throughout this thesis, helping to understand how borders are constructed, but also revealing their dynamic nature and their potential to change. My research is inspired by Aristotle (as depicted by Rubinelli, 2018), who believed that if citizens have the tools to break down a persuasive argument, they could determine whether the argument is worth supporting or if a different solution is better suited. This highlights the emancipatory component of the critical paradigm; As a researcher, my goal is to provoke critical examination of existing bordering practices and pave the way for transformational policies.

1.3 Historical Background

According to the US government, naturalization is "the conferring, by any means, of citizenship upon a person after birth" (Homeland Security, March 16, 2018). However, since the late 18th century, these means have been largely controlled under one system; The US naturalization process was established with the Naturalization Act of 1790 (Cohn, 2015). Based on a system for colonial citizenship under the British Empire, this bill laid the

foundations of US citizenship acquisition. Immigrants were determined eligible to pursue citizenship if they were considered 'free' and 'white' — immediately excluding Black slaves of African descent and Native Americans. In addition, those who were eligible could only become a citizen if they provided proof of 'good moral character' and if they swore allegiance to the US and its newly formed Constitution. Both of these categories were inconsistently enforced and up to the discretion of the local court presiding over the naturalization. During these early years, there was no language requirement for acquiring citizenship. In fact, while the groups who were explicitly excluded from citizenship were being forced to give up their native languages to learn English, European immigrants experienced much linguistic freedom (Iyengar, 2014).

It was only after the end of slavery in 1865 that former, US-born, slaves were considered citizens, and it was only with the Naturalization Act of 1870 that people of African descent were eligible to naturalize (Cohn, 2015). Yet, this act continued to exclude Native Americans. With the steady increase of European immigrants during the Age of Mass Migration, large numbers of people became eligible for US citizenship. In response, the US naturalization process became stricter (Orgad, 2011). It was with the Basic Naturalization Act of 1906 that the linguistic pluralism of the naturalization process ended and an English language requirement entered. In the years to follow, language and literacy, would become ingrained in the process, despite many critiques of their xenophobic underpinnings (Orgad, 2011). With the Indian Citizenship Act of 1924, Native Americans were given national status, yet voting and other rights that were granted to other citizens did not come to them until later. Monolingualism was further solidified with the Immigration and Nationality Act of 1952 which required reading, writing, and speaking in English. In addition, a civics test was also introduced.

The US naturalization changes during the 20th century were greatly shaped by the Americanization Movement (Bandiera et al, 2019; Orgad, 2011; Pavlenko, 2004). Driven by concern that immigrants posed an imminent threat to 'American culture and values', it based much of its justification on the findings from the bipartisan United States Immigration Commission. Besides restricting people from entering the country, the Americanization movement used education to mold existing immigrants into 'upstanding' citizens (Bandiera et al, 2019). As the century went on, the civics component of naturalization gained more weight and in 1986, a standardized test was issued (Orgad, 2011).

The latter half of the 20th century was shaped by the Civil Rights Movement. Many outcomes of the Americanization movement started to be critiqued as discriminatory. During this time, there was also considerable national rebranding based on multiculturalism—for example, President Kennedy's re-branding of the US as a 'Nation of Immigrants' (As referenced by Kivisto, 2015). In line with a discursive shift, immigration and naturalization laws started to change too. Instead of excluding immigrants based on nationality or ethnicity, there was a larger emphasis on 'need', 'skill', and an ever-growing emphasis on 'legality'³. In addition, there was constant praise for select 'model citizens' who against all odds, 'earned' the 'American dream' (See Wu, 2013 for example). Furthermore the catchall category of 'good moral character' was still used to cover a host of covert racially and ethnically charged forms of discrimination⁴.

A large change in the US naturalization process came in response to the terrorist attacks on the Twin Towers and US Pentagon on September 11th, 2001 (9/11). Shortly thereafter, the Bush administration enacted the USA Patriot Act (2001), increasing penalties for terrorists and surveillance of those suspected of terrorist activities. Then, President Bush submitted a proposal to gather security measures and to house them together under “a single, unified homeland security structure” (Homeland Security, June, 2002, p. 2) and the US swiftly saw the adoption of the Homeland Security Act of 2002. This act erected many new measures, departments, and positions, and it also took on some existing agencies under the new umbrella. Most relevant for this research project, the existing Immigration and Naturalization Service (INS) was moved from the Department of Justice to DHS. INS was divided into three departments under DHS's umbrella: US Customs & Border Protection (CBP), Immigration and Customs Enforcement (ICE), and USCIS. Thus, naturalization became housed under the newly formed DHS and its new subdepartment, USCIS. This change also established the OoC under USCIS (USCIS, August 24, 2020).

While the US government was going through this large-scale restructuring, animosity towards Muslim Americans and Muslim immigrants was growing (See Colombo, 2015; Keskinen, 2012). At the same time, patriotism and nationalism were on the rise, with a reinvigorated reverence towards civil religious American symbols, such as the American flag,

³ See Cohn (2015) for an overview of the many new refugee policies during the 20th century, the changes to quota systems, and the increasing number of policies for deportation of 'illegal' immigrants

⁴ See Orgad (2011) and Bishop (2017) for more on the history of 'good moral character' throughout the naturalization process

and heroized government bodies, like the US military. In fact, in the wake of the attacks, President Bush made it possible to expedite naturalization for persons in the US military (Exec. Order, 2001). To this day, immigrants who serve in the US military for any period of time can take a fast-track to citizenship, earned through their contribution to combat 'the war on terrorism' (USCIS, September 16, 2021).

Although the banner of the Americanization movement was mostly abandoned in the 20th century, the civic education of immigrants continued. In June of 2006, the Bush administration pushed forth a cross-departmental "Task Force on New Americans" which included leadership from the OoC. This collaboration was tasked with finding ways to "strengthen the efforts of the [DHS] and Federal, State, and local agencies to help legal immigrants embrace the common core of American civic culture, learn out common language, and become fully Americans" (cited by de Graauw & Bloemraad, 2017 p. 116). In a 2008 report, the task force stated a desire to construct an Americanization movement for the present-day. This task force took on the redesign of the US citizenship test the product of which went into effect in 2008. In 2009, early into the Obama administration, a White House Task Force for New Americans was established with an integration focus (p. 116). The CGP stemmed from this task force. It was charged with promoting citizenship and assisting immigrants in the steps to attain it. Since 2008, the overarching steps to naturalization have stayed much the same, broken down into the *10 Steps to Naturalization* (USCIS, January 20, 2021):

1. Determine if you are already a US citizen
2. Determine if you are eligible to become a U.S. citizen
3. Prepare your Form N-400, Application for Naturalization
4. Submit your Form N-400 and pay your fees
5. Go to your biometrics appointment, if applicable
6. Complete the interview
7. Receive a decision from USCIS on your Form N-400
8. Receive a notice to take the Oath of Allegiance
9. Take the Oath of Allegiance to the United States
10. Understanding U.S. citizenship (para. 1)

Although the overarch naturalization steps have stayed fairly consistent since 2008, the specifics of the steps are altered fairly regularly. For example, almost yearly there are

updates to the N-400 application and to the fees associated with it. As another example, on December 1st 2020, USCIS issued a new citizenship test, increasing the civics test questions (asked in the naturalization interview) from 100 to 128 (Lubet, December 3, 2020). However, it didn't last long. Newly elected President Biden issued a swift *Executive Order on Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans* (2021), reverting back to the existing citizenship test. In addition, the order reported other ventures. Biden instituted a new Task Force on New Americans under the White House Domestic Policy Council and expressed intent to eliminate barriers to naturalization, including financial barriers, which could be promising for those immigrants with low financial status.

Throughout the course of the historical background, I have presented relevant information on the US naturalization process and how the CGP has been formed. While the background is not exhaustive, it does give a solid base for understanding the data and my analysis of it. In addition, the reader should be able to grasp the general steps of the naturalization process, while also recognizing that each step contains differing details, depending on the individual immigrant who is applying for naturalization and the specific bureaucratic requirements during the time of application.

2 Key Concepts

Having introduced the thesis topic, the research questions, plus the theoretical and historical background, this study will now move to an overview of key concepts. By examining discussions and debates surrounding the concepts presented in the historical background and found in the data, the reader will gain a better understanding of my theoretical perspective and how it relates in the context of US policy.

2.1 The State, The Nation and National Identity

In *Introduction to Geopolitics*, Flint (2006) distinguishes between the commonly misunderstood terms, state and nation. To start, state refers to a sovereign government that wields control over a spatially bound area. Straight-forward as it may sound, states are sometimes overlapping. The US poses an interesting example. It is both made up of states and is a state in itself, simultaneously containing smaller state governments while nested in an overarching federal system.

Unlike state, nation is not necessarily tied to geographic territory (Flint, 2006). Anderson (2006) offers a working definition that has been widely accepted in the humanities and social sciences. They describe the nation as "an imagined political community [that is] both inherently limited and sovereign" (p. 6). By using the word imagined, Anderson (2006) highlights the socially constructed nature of a group whose members are connected by their shared idea of one another. This means that a nation can exist within the territorial borders of a state, but it can also transcend those borders and even exist without them entirely. In addition, this definition highlights that the nation is not meant to include everyone in the world, wrapping boundaries around different people at different times throughout history. Furthermore, the nation is considered the supreme authority over its members, guiding their values and how they act them out.

When considering the definition of national identity, one can continue to look within the components that underpin Anderson's (2006) definition of the nation; in order to constitute a nation, a group must hold a collective cultural consciousness as well. Indeed, the concept of nation is closely tied to culture, which refers to a group's shared modes of knowing, being, and doing. Thus, the national imaginary that Anderson (2006) describes not only speaks to what a national community thinks about themselves, but how their unique collective

identity— their national identity— determines cohesive ways of living— social cohesion. De Cillia, Reisigl & Wodak (1999) conceptualize the enactment of national identity as a type of habitus⁵: A set of related perceptions, emotions, and behaviors which rely on national socialization (p. 153). Part of this socialization stems from the nation's limited nature, as community members legitimize their own belonging in a group by differentiating themselves from the national other. Here, one can see that it is within national habitus where the imagined community becomes rooted in reality— affecting the lived experiences of both national insiders and outsiders.

Like the nation, the concept of nationalism has developed alongside various ideological projects, such as capitalism and colonialism (Conversi, 2012). In fact, many scholars believe that nationalism is an ideology in itself. Bieber (2018) asserts that nationalism is a narrow yet pliable ideology that puts national membership before any other affiliation, aims for separation and protection from other nations, and believes nations are the most logical type of political community. Conversi (2012) speaks to the more extreme ideologies which add several other beliefs: "[1.] to be free, every individual must belong to a nation; [2] every nation requires full self-expression and autonomy; [and 3] global peace and justice require a world of autonomous nations." (p. 16). Certainly, the most radical forms of nationalism contain the 'civilizing' sentiments that fueled genocide, slavery, and assimilation under Western colonialism. That being said, some scholars (Anderson, 2006 included) do not think nationalism is inherently so extreme and are hesitant to sweepingly call it ideology (Conversi, 2012). Nevertheless, there are ongoing concerns surrounding the role nationalism plays in contemporary societies and growing research on nationalist sentiments as they relate to racism, xenophobia, and systemic violence (Bieber, 2018).

In the realm of nations and nationalism, the concept of nation-building merits consideration. Put simply, nation-building is the strategic construction of a nation (Mylonas, 2013). Although there are many national imaginaries that have been initiated without a state or initiated as a means to produce a state, there is much historical evidence of nation-building as a state-led effort. Thus, state-sponsored nation-building can be understood as national socialization that is enforced through a variety of governmental tactics. The concept of nation-building is dominant in the fields of History and International Relations where one can find an abundance of scholarship about nation-building efforts in relation to 'developing' areas

⁵ Here De Cillia, Reisigl & Wodak (1999) are building off the work of Bourdieu (1994)

(Kuzmarov; 2009; Suri, 2017). These projects are managed by the state powers of the 'Global North', of which the US is prominent, if not dominant. In contrast, there is also research that considers the aspects of nation-building which is turned inward, considering the ways in which the US has used nation-building as a tool to bolster its own state cohesion (Mylonas, 2013, Iyangur, 2013). In the context of the US, inward facing tactics have included, for example, education (Bandiera et al., 2018), national branding (Browning et al., 2017), language assimilation (Pavlenko, 2002), and administration of shared symbols and traditions (Lienesch, 2019). Even though nation-building efforts are mostly considered to be inward or outward, Kramer (2018) connects the two. Kramer (2018) argues that both internal and external policies contribute to US state and global power. They call for more attention to this fluid connection and the practice of "neocolonial empire-building" (p. 403).

After a clarification of concepts, it is apparent that a state is not always a nation and a nation is not always a state. Yet, the concepts are often used interchangeably, sometimes even in conjunction. For example, the compound word nation-state is frequently used in politics and International Relations (Flint, 2006). As one might expect, it combines the sentiments behind both nation and state, describing a community that shares a government, geographic territory, and a sense of belonging. Although the term is popular, its accuracy has been called into question. Achieving a homogeneous national consciousness within one state is a very difficult task and very few states fit the bill. For this reason, Flint (2006) believes that nation-state better describes a goal rather than a label. Moreover, they argue that the complete substitution of the word nation for state is a state-led effort to equate national identity and solidarity with state control— in effect, it can be considered a nation-building strategy in itself.

2.2 Migration and Immigrant

At its core, migration is the movement of people or animals from one place to another, and a migrant is a person or animal on the move (International Organization for Migration (IOM) & The UN Migration Agency, 2018). Moreover, human migrants are further classified in various ways depending on the context of their movement. Numerous dichotomies have formed based on state classification systems for migrants including Internal|International, Forced|Voluntary and Emigrant|Immigrant (Leppäkorpi, lecture notes, October 31, 2019). Although these dichotomies are widely problematized for being too simplistic (in this thesis

as well), the label immigrant is widely present in the context of the US and in text surrounding the CGP. Thus, immigration, can be understood by its definition in US public policy— as the flow of people into a state with the intent of residing permanently (USCIS, n.d.). Thus, an immigrant can be understood as someone who has moved from one state to another and is 'permanently' residing in the new state or intends to.

There are two other definitions which fit under the label of immigrant and which are important in the CGP. First, refugee is considered a subcategory of immigrant. DHS (Homeland Security, March 16, 2018) defines a refugee as such:

Any person who is outside his or her country of nationality who is unable or unwilling to return to that country because of persecution or a well-founded fear of persecution. Persecution or the fear thereof must be based on the alien's race, religion, nationality, membership in a particular social group, or political opinion. (under R, para. 1)

Closely related, asylee is defined by DHS with only slight differences (Homeland Security, March 16, 2018):

An alien in the United States or at a port of entry who is found to be unable or unwilling to return to his or her country of nationality, or to seek the protection of that country because of persecution or a well-founded fear of persecution. Persecution or the fear thereof must be based on the alien's race, religion, nationality, membership in a particular social group, or political opinion. (under A, para 8)

With both refugee and asylee, a person who self-identifies with either of their definitions is not necessarily given their status. Through the process of seeking asylum, the state determines whether or not status is granted. Indeed much of the labeling surrounding immigration is not done by immigrants themselves, but given by governmental departments, and circulated by numerous actors in political and public discourse.

In the context of the US, the overarching label of immigrant may stick with a person for many years. The label of immigrant has been known to stick with certain people and groups so much that they pass through generations (Neergaard, 2021). Hence, 'first-generation immigrant' denotes a person who made the move to a state, their children are 'labeled second-generation immigrants' though they were never considered to immigrate themselves, and 'third-generation' denotes their children, and so on. While these categorizations have been critiqued by many, the labels persist, especially in realms where there is a desire to track the behavior of these generations and their ability to 'successfully' adopt national identity over

time (Neergaard, 2021). Yet, the labels have been known to stick to some people and groups more than others. The stickiness of these labels often has to do with the social construction of race and perceived proximity to Blackness (immigrant label sticks) or to Whiteness (immigrant label falls away quicker or is not given at all) (See Cornell and Hartmann, 1998). There are intersectional factors that aid these perceptions— for example, ethnicity, class, education level, and religion (See Crenshaw, 1989 on intersectionality). Thus, the construction of race and the value given to people based on their racial categorization is not so much about skin tone as it is about culture and power (Cornell and Hartmann, 1998; Glazer, 2016).

2.3 Nationality and Citizenship

Nationality refers to an official legal status that determines the rights and obligations of a person in relation to a state (Jones-Correa, 2001). To have the nationality of a state is to be the responsibility of that state's government and to be offered its protection on an international scale. States have varying ways of determining nationality and currently, there are several ways to become a US national: by being born on US territory (*jus solis*), by inheriting nationality from a parent (*jus sanguinis*), or by naturalization (USCIS, November 6, 2019). Although the US presents more pathways to nationality than many other states (Jones-Correa, 2001), becoming a US national is not open to everyone. There is a certain territorial component that precludes each avenue, requiring a person, or their ancestor, to have had physical presence in the US. Additionally, other factors contribute to an individual's eligibility for nationality, especially for foreign nationals who have immigrated and are going through the naturalization process (USCIS, November 6, 2019). Although, it is not necessary to go into detail on the exact nuances of nationality in this section, or the precarity of it⁶, one can decipher the formality of the term and the explicit legal status it denotes. Furthermore, one gathers that besides having the root word of nation, the word is closely tied with the rules and regulations of the state. Although naturalization is the official acquisition of nationality, in the US, naturalization is more readily associated with the acquisition of citizenship; A person who has completed the naturalization process is predominantly called a US. citizen.

In the *Handbook of Citizenship Studies*, Insin & Turner (2002) state that citizenship can relate to community belonging at any level. For instance, a citizen can refer to a member

⁶ See Gibney (2020) for more on statelessness and denaturalization

of a geographic region, like a neighborhood or city. It can also apply to non-territorial spaces such as global cultural communities or digital communities. However, in the US and in many other state contexts, citizenship is often understood as national citizenship—referring to membership within a nation-state. Joppke (2007) defines citizenship on these terms as well. They disaggregate citizenship into three dimensions:

citizenship as status, which denotes formal state membership and the rules of access to it; citizenship as rights, which is about the formal capacities and immunities connected with such status; and, in addition, citizenship as identity, which refers to the behavioral aspects of individuals acting and conceiving of themselves as members of a collectivity, classically the nation, or the normative conceptions of such behavior imputed by the state. (p. 38)

In their own definition, Bloemraad et al. (2008) seem to split an identity dimension in half, conceptualizing citizenship as “forms of participation in society, and [as] a sense of belonging” (p. 154). In both interpretations, one conclusion is clear; Citizenship includes cultural and participatory facets which are additional to the requirements for nationality.

Seminal citizenship scholar Insin (2002) traces citizenship back to Ancient Greece where political participation was heavily emphasized. From Insin (2002) one gleans that citizenship is not necessarily something that a person possesses but something they practice, perform, and maintain. This notion has been found and expanded on by numerous scholars who examine citizenship in different contexts throughout time and space, many of which have been highlighted in previous sections of this thesis, and will be expanded in subsequent sections. Yet, while many immigrants seem to practice the cultural components of citizenship, actively participating in national communities, some are ineligible for the official title of US citizen. In contrast many US nationals by birth are not as active, yet maintain their status easily. Furthermore, there are some individuals who obtain national status yet are treated as second-class citizens; Whether by racialization or criminalization (often both) full participation can be curtailed by the state (See Massey, 2021). Like nationality, citizenship can be continuously precarious based on discrimination against a host of intersectional factors.

Insin and Turner (2002) problematize "the nation-state as the sole source of authority [over] citizenship and democracy" (p. 3). They argue that in a globalized post-modern society, the boundaries of citizenship have been blurred, challenged, and debated in new and innovative ways. Similarly, Cisneros (2011) finds that immigrants of various legal statuses

actively resist national exclusion and exercise agency over their right to American symbols, culture, and identity. With these, and other findings (See Brooks & Holford, 2009 on post-national citizenship), many scholars agree that “the sovereign state is no longer the only locus of citizenship” (Insin & Turner, 2002, p. 5). Still, the state still holds much power. While many marginalized groups have won many battles in the fight to be included in American national identity, their inclusion can easily be prevented, ignored, silenced, even eradicated. Even Insin & Turner (2002) admit that “while negotiations for citizenship take place above and below the state, laws are still enacted at national levels” (p. 5).

Keeping this in mind, Insin (2002) draws attention to the role of power dynamics in definitions of citizenship. They call power-holders “the victors: those who were able to constitute themselves as a group, confer rights on and impose obligations on each other, institute rituals of belonging and rites of passage, and, above all, differentiate themselves from others” (p. 2). Insin (2002) encourages scholars to not only focus on what citizenship means but who decides what it means. They argue that powerful actors always direct the components of political membership, determining who can engage in a community and how.

2.4 Assimilation and Integration

Having discussed terms surrounding national identity and citizenship, this section will now move to two concepts which are associated with the cultivation of them— assimilation and integration. In 1930, Robert Park provided, what was for many years, a foundational definition of assimilation. Park described (social) assimilation (as cited in Gordon, 1964, p. 63) as “the process or processes by which peoples of diverse racial origins and different cultural heritages, occupying a common territory, achieve a cultural solidarity sufficient at least to sustain a national existence”. Yet, today, these words could hardly be recognized as assimilationist. Over the years, assimilation has developed a very different connotation.

The classical assimilation model that was developed by Park (as cited by Gordon, 1964) then Gordon (1964) regarded assimilation to be a final step in an immigrant adaptation process where the ultimate goal was to live free without discrimination. Within this model, integration is named as a step to assimilation. However, for many years the classical assimilation model was widely abandoned as other adaptation frameworks emerged. One of the most popular has been Berry's (1997) acculturation model. Unlike the classical assimilation model, Berry places integration and assimilation at odds: Integration is seen as a

multiculturalist (two-way) process where immigrants and their receiving society give and take culture and assimilation is deemed a homogenizing (one-way) process where immigrants are expected to leave their own culture behind in order to adopt a new, 'American' one (Bloemraad et al., 2017).

Indeed, the polarization of integration and assimilation is well permeated in the US context and in immigration discourse. And although, Glazer (1993) and Bloemraad (2008) deem assimilation as unpopular and negatively associated, in recent years, the term has gained popularity and been increasingly seen as an integral part in what makes America 'successful' (Salins, 1997), or in the words of President Trump's campaign slogan, 'great'. Indeed, many US citizens—commonly thought to associate themselves with the conservative values and the Republican party—see immigrant assimilation as an integral tool in molding model citizens and fortifying a secure and powerful nation. On the other hand, many integrationists—frequently equated with multiculturalism and Democratic party—hear the term and it sets them on edge. However, what are considered the core tenets of assimilation—speaking English, displaying patriotism, and having a Protestant ('pull yourself up by your bootstraps') work ethic (Salins, 1997)—can be seen in policies by assimilation and integration-based administrations alike. These tenets make up what Salins (1997) calls "the assimilation contract" (p. 6). They argue that immigrants would only be fully welcomed into 'the American family' and be able to fully adapt to US society if they are able to uphold the contract.

2.5 Social Cohesion and Security

While both the concepts of assimilation and integration aim for the adaptation of immigrants, they also relate to cultivating a cohesive society. Although the core definition of social cohesion is widely accepted — trust and cooperation between members of a society — various institutional bodies have different ways of conceptualizing the term. Chan et al. (2006) argue that the term social cohesion has inconsistent understandings between the domains of public policy and sociology. Sociologists consider it as an "attribute" of society, while in public policy, social cohesion is often a process or an ideal to achieve (p. 290). Similarly, Larin (2020) contends that civic integration (or assimilation) policies, which attempt to build social cohesion, miss the mark. Larin (2020) believes that "'shared values' are the product of [the integration] process, not the mechanism to achieve it" (p. 128). They further argue that these policies do not function in the way they are intended to and, often, do

not aid the integration of immigrants. Rather, Larin (2020) says, they "function, sometimes deliberately, as a form of migration control" (p 128).

Indeed, there are scholars who argue that the US naturalization process is a series of gatekeeping mechanisms which serve as data capture sites for immigrant surveillance, and weed out applicants which are deemed 'undesirable' (Aptekar, 2015; Aptekar, 2016). Furthermore, while many integrationists and assimilationists alike agree that full adaptation does not take place within the 'first generation' of immigrants, much scholarship shows that 'model citizenship' is expected from them (Bishop, 2017; Gerken, 2013; Wu, 2013; Yukich, 2013). This brings up questions about who the policies are for, and who's security is prioritized under social cohesion and the measures that seek to cultivate it.

Brooks & Holford (2009) assert that state interest in citizenship education is attributed to several factors: The attempt to persuade individuals to support themselves instead of seeking welfare assistance from a state, and the desire to combat the "perceived problems of living in an increasingly multicultural and ethnically diverse society" (p. 88). They track a subset of citizenship literature that links the national focus of citizenship and state-led citizenship initiatives to national security anxiety which was stirred in response to 9/11. Brooks & Holford (2009) are not the only ones who make a connection between citizenship training and security. Indeed, there is much literature in Critical Security Studies which investigates the practice of presenting immigrants as threats to social cohesion and national security— also known as the securitization of immigrants (Aradau, 2004; Bigo, 2002). In this study area, it is argued that definitions of security are contested (Buzan et. al., 1998) and in order to unpack the definition of security in a certain situation is to ask "For whom?" And "For which values?" (Baldwin, 1966, p. 13). These questions can help to unveil the power structures which construct the borders— or borderscapes— of belonging and the relationship between inclusion and exclusion.

3 Review of Closely Related Literature

In reviewing the key concepts, it is clear that the overarching topic of this thesis is widely studied in academic scholarship. Therefore it is crucial to identify where this research fits in and how it contributes to the discussion in a new and fruitful way. This section will outline the most closely related literature from which this thesis stems, and will identify the gap in research in which this thesis fills.

Gerken's (2013) book, *Model Immigrants and Undesirable Aliens: The Cost of Immigration Reform in the 1990s*, tracks a change in discourse that occurred at the turn of the 20th century. In this tracking, Gerken (2013) compares political debates about documented vs. undocumented immigrants and finds stark differences. They find that discourses on either end of the political spectrum (progressive \Leftrightarrow conservative, democrat \Leftrightarrow republican) paint undocumented or 'illegal' immigrants as undeserving of state security and national inclusion. Throughout the book examples are given of the ways in which ambiguous language of diverse cultural inclusion is used alongside policies which overtly exclude undocumented immigrants. Furthermore, Gerken (2013) argues that among seemingly welcoming and culturally pluralist words, restrictionist policies, which are found in many areas of US history, hold strong—revealing that while language shifted, the policies did not necessarily shift in the same manner.

There is much literature that unpack how multiculturalism has impacted political and public discourse and how they have made their way into policy (See Colombo, 2015). In addition, there is much research on the role that critiques of multiculturalism have had. Indeed, many critiques were present at the turn of the 21st century. Keskinen (2012) says that a 'crisis of multiculturalism' discourse emerged in the 1990s and was solidified after 9/11, spreading around the globe. This discourse placed certain immigrants as socially threatening. In their 2012 research, Keskinen examines a discursive trend of politicians claiming an inherent incompatibility between Muslim values and the democratic values. Keskinen (2012) finds that powerful actors use the “politics of reversal” to discursively construct an impenetrable boundary between Muslims immigrants and national citizenship (p. 271). Through the re-working of anti-racist ideas and co-option of terms, they argue that politicians create a series of layers that are difficult to peel back and determine whether these phrases are used to cover a nationalist agenda, or if they are genuinely implemented in policy with the

intention of aiding integration. Although Keskinen (2012) discusses the politics of reversal within the context of the Nordics, the concept is applicable to other regions, including the US. Furthermore, although Keskinen (2012) discusses the politics of reversal in relation to Muslim immigrants, they are not the only targets. She argues that different groups have been targets at different times and in different contexts.

In *Criminalizing Migration*, García Hernández (2021) maps US political rhetoric and the US law and policy coming out of varying presidential administrations in order to unpack the stigmatization of migrants, Mexican immigrants in particular. They find that all administrations, regardless of political affiliation, construct strict dichotomous categorizations which do not leave room for complexity. For example, President Obama polarized "felons" and "families"—posing the former as threats to security, and the latter as harmless units (Obama, November 20, 2014). Then, President Trump polarized Norwegian and Mexican immigrants—determining the former to be desirable candidates for US citizenship (See Dawsey, January 12, 2018) and the latter to be a bunch of criminals (See Phillips, June, 16, 2017). Although the components of desirability change from year to year, García Hernández (2021) says that the "spectrum of desirability" remains in place (p. 113). Thus, García Hernández (2021) concludes that while there are differences between the discourses of Republicans and Democrats, they continue to share a dedication to categorizing and controlling migrants. Furthermore, they determine that this bipartisan labeling based on desirability is used in a manner that projects objectivity, masking their constructed and ultimately subjective judgements and their ideological underpinnings. Moreover García Hernández (2021) argues that in addition to molding migrants through categorical labeling, acts of law—such as policing and prosecution—transform labels from mere symbols into practical means for everyday oppression.

García Hernández (2021) speaks of desirability, but other scholars confront a deservingness dichotomy. Yukich (2013) says,

while immigration scholars rarely explicitly associate assimilation with worth and deservingness, there are many subtle practices that equate 'deserving' to immigrants who assimilate into white, middle-class society and 'undeserving' to those who assimilate more slowly, not at all, or into other segments of society. (p. 303)

They argue that these constructions discourage immigrants from resisting dominant cultural norms. Moreover, in their study, Yukich (2013) looks at rhetoric beyond presidential actors

and other elected officials, focusing on immigrant activists from an interfaith movement called, The New Sanctuary Movement. They examine the activists rhetorical strategies and how they attempt to counter the dominant immigrant discourse. They find that despite their intentions, the activists perpetuate the deservingness dichotomy as well, just upon slightly different lines than their so-called ideological enemies. Yukich (2013) uses a dramaturgical theoretical approach to connect the rhetoric to lived realities. They argue that through rhetoric, certain individuals are cast into model roles. Although they have individual agency over their lives, there are still certain scripts and directions in which they take on, and certain actions in which they are expected to perform. From this study, they conclude that "images of the model immigrant, and an associated distinction between deserving and undeserving immigrants, are being actively constructed not only by conservatives, anti-immigrant groups and politicians bent on compromise [...] but also some pro-immigrant activists" (p. 315).

Waerniers & Hustinx (2019) use labyrinth as a metaphor to describe the multifaceted and contradictory arrangement of immigrant categorizations and framings. They especially focus on those who have been granted refugee status in Belgium. After examining frames and categorizations in Flemish policy, they find that the "policy discourses do not simply use the distinction between excluded/undeserving/ non-citizens and included/deserving/citizens" but that the discourses are woven into a tangled discursive web (p. 284). In addition, they reflect on a finding from Chauvin and Garcés-Mascreñas (2012) that discuss a nonlinear trajectory of "probationary citizenship" for immigrants (p. 253). Waerniers & Hustinx (2019) identify this as a murky stage where immigrants are theoretically able to attain the status of citizen, but through testing in the probationary civic-integration program, many are screened out on moral grounds. Furthermore, they find that even once obtaining national status, non-white people who have immigrated are still treated as second-class citizens. They find that "only white Belgians are regarded as 'full citizens', as they are the only category to [be considered to] possess both formal and moral citizenship." (p. 285).

In recent years, there have been expansive public discussions surrounding the US immigration system and growing debates about physical bordering practices. In addition, there has been much scrutiny about nationalist rhetoric and its implications in state policy. Yet, much of these debates focus on the most explicitly restrictionist policies. In contrast, there is limited scholarship which critically examines the US naturalization process—considering both its territorial and cognitive components. Below are a few.

Orgad (2011) conducted a study called *Creating New Americans: The Essence of Americanism Under the Citizenship Test*. In the 72 pages, Orgad (2011) maps the history of the US citizenship test and closely examines the 2008 redesign of it. In the analysis, they find that many of the same components of the citizenship test and citizenship education under the Americanization movement can still be seen. Even though the movement has been highly criticized, the citizenship test rarely has. Orgad (2011) finds that citizenship test to be of large significance in US public life, not only because it is mandatory for those who are undertaking naturalization, "but because it defines what 'American' means" (pp. 1296–1297). They call for continued examination of IS citizenship and naturalization policy, in order to challenge the state-sanctioned definition of 'American' and who can be included in it.

In the study, *Model Citizens: The Making of an American Throughout the Naturalization Process*, Bishop (2017) examines a key document issued by USCIS: the *Guide to Naturalization*⁷. Grounded in performance theory, Bishop (2017) examines the texts and finds that "naturalization requires applicants to be more than obedient law-abiding citizens. The naturalization process serves the goal of manufacturing model citizens who will embrace wholeheartedly their new nation and accept the government's authority as ultimate, necessary, and just" (p. 494). At the end of the article, Bishop (2017) poses points for future research. They point out that US naturalization policy is continuously changing and benefits from constant examination. In this examination, they call on communication scholars for their contribution to the topic (p. 495). In addition, they stress push back on the supposition that naturalization policy only impacts immigrants. They assert, "[t]he ways citizenship is portrayed in naturalization discourse has direct implications for citizens and noncitizens alike" (p. 495).

In a citizenship class for Bhutanese adults with a refugee background, Chao (2020) studied the "complex interplay of ideologies of citizenship, language, and identity" (p. 1). Over 17 months conducting an ethnographic case study, Chao (2020) sought to understand how the class participants as well as their instructor perceived citizenship and their relation to it (p. 2). Critical discourse analysis was one of the methods in Chao's (2020) study. It was used to "unveil the invisible and/or imposing beliefs behind classroom discourse" (p. 7). From interactions and interviews, they found that many of the participants considered the legal status of citizenship a concrete connection to a 'home' or 'homeland' and they desired that

⁷ See USCIS (July 6, 2020) in the reference list, although Bishop examines an earlier version.

acceptance as national members from the US. Chao (2020) observed that the classroom instructor, a volunteer in the church-based program, had a nationalist view of identity, based on his own Christian principles. Chao quotes the teacher, "'To truly become 'full' American citizens, refugees must take on an American identity in the way that they speak, think, worship and live'" (p. 9). The teacher emphasized that while the students, at first, just wanted to learn the correct answers in order to pass the citizenship test, the teacher wanted them to go beyond that. Chao (2020) noted that the teacher explicitly delineated between himself and the students, acting as their insider trainer, to mold them — the outsider — into culturally safe citizens. Chao identified a disconnect between the teacher and participants on many levels. In conclusion, Chao (2020) found that "ideologies of citizenship are not just about citizenship acquisition. Rather, they also index and enact ties to language, culture, and everyday practices to being, to becoming, to doing, to valuing, and to knowing" (p. 15).

In examining the US naturalization process, Damsholt (2009) applies Butler's (1993) noteworthy contribution to Gender Studies and regards identity (gender, religious, national, etc.) as enacted instead of granted. In their research, Damsholt (2009) examines the "ontological choreography" which is expected of new citizens at naturalization ceremonies across Western countries (p. 20). They find that through ritualization and materialization, citizenship is expected to be instilled in the heart. Yet, they obtain different opinions from new citizens about whether or not they have been transformed from the inside out. While some felt that their hearts had been touched, many study participants did not feel the naturalization ceremony itself would have long-term impact in their lives. Those who participated found the rights granted through naturalization were more impactful than the mandatory public spectacle.

In the same vein, Harper (2017) scrutinizes public symbols for their performative aspect and questions the public ritual of making citizens through US naturalization ceremonies. They argue that the naturalization application is designed to weed 'undesirable' people out— acting as a gatekeeping mechanism— and that the ceremony is the final conversion point for the most 'desirable' and 'deserving'. Although the naturalization ceremony is the official point where immigrant applicants receive a new status, Harper's (2017) study finds there is little space for reception. Even in the act of accepting status, citizens are expected to be giving back to the state— contributing to the legitimization of

'American' symbols and ultimately, 'American' power. In this sense, the status can be seen as taking on a responsibility, rather than a right to take in.

All of the aforementioned scholars who specifically research the US naturalization process, identify US naturalization policy as an understudied area and call for more critical examination of it. Within the understudied area, the CGP has received almost no attention. In fact, when searching for academic literature on the topic, only one article mentions the grant program.

In the article, *Working Together: Building Successful Policy and Program Partnerships for Immigrant Integration*, de Graauw and Bloemraad (2017) call for an expansion of the CGP. They argue for a continuation of bipartisan collaboration and emphasize it as a win-win project:

When immigrants have more opportunities to learn English, to improve their schooling and professional training, to start businesses, and to access citizenship, we all benefit. More fully integrated immigrants and refugees boost the economy and strengthen community cohesion...These are integration outcomes that all Americans, regardless of their partisan preferences, will support. (p. 119)

In essence, de Graauw and Bloemraad (2007) give a full endorsement rather than a close look. Interestingly, they also use language of integration while demonstrating a desire for the cultivation of assimilationist tenets. Not only does the fact that there is one scholarly article about this part of policy reveal a gap in research, but it shows the value of having examination of policies from different disciplines and perspectives.

I was able to find one alternative perspective from an article— admittedly not an academic article, but a news article. In 2017, Newsweek published an article about an alteration in the CGP's title (Lowe, 2017). From 2010-2016 the overarching program had been called the *Citizenship and Integration Grant Program*. Then in 2017, the title was switched to the *Citizenship and Assimilation Grant Program*. In the article, Newsweek presented interviews with several people. One of the interviewees was Justin Gest, a public policy professor at George Mason University. In reaction to the title, Gest argued that "the history of the words *assimilation* and *integration* are not necessarily that different" (para. 5), and warned against expecting large-scale practical changes to the CGP. Yet, Gest also noted that the names of federal programs do not simply switch without a reason. Gest says "Donald Trump has overtly sought to re-establish a bygone era of what he portrays as safety, stability and

prosperity, and in trying to re-establish that era there is the implication that that era A) existed, and B) was something that actually was stable and that was static. Whereas in reality, there has never been that kind of stability in the American identity or American society" (para. 15). By pointing out the only slight differences between integration and assimilation, and warning not to be too occupied by the name change, Gest encourages readers not to have tunnel vision on Trump— to look beyond his words and connect it with policies, but also to look beyond the Trump administration and the policy changes before and after. In the same Newsweek article, an unnamed USCIS spokesperson was also interviewed in order to provide some institutional reasoning. The spokesperson said, "the name change simply reflects USCIS's renewed emphasis on encouraging new immigrants to be part of our national family through shared political principles, a sense of community and common identity" (para. 11). They connected the change in title to the program's goals overall, emphasizing an "attachment to the Constitution and the American ideals that strengthen this nation and secure our homeland" (para. 13).

While the aforementioned texts build the literature that precedes this study based on its contextual and theoretical content, there are two more studies which are methodologically significant for my own study. The first is a study by Kock and Villadsen (2017) regarding the rhetorical aspects of citizenship. Before Kock and Villadsen (2017) conduct their analysis, they outline the concepts of citizenship, rhetoric, and democracy and their concurrent upbringings in Ancient Greece. They argue that this developmental linkage is important to highlight and that all three concepts should be considered in their relationship with one another. In their analysis, they use RA to examine two examples of speech acts during what is commonly called the 'European refugee crisis'. Their data include a text produced by the #PeopleReachingOut activist group in Denmark and the 2016 New Year's speech from the Danish Prime Minister. By examining texts from two perspectives which are often seen as ideologically contrasted, Kock and Villadsen (2017)'s analysis "illustrate[s] how the concept of citizenship is assumed, used, and contested in public rhetoric" (p. 583). They find that people who occupy different roles in society contribute to "the ongoing discursive creation and enactment of civic self-understanding" (p. 582). They believe that the critical examination of the performance of citizenship can create dialogue across polarization, allowing members at all levels of society to recognize their agency in enacting change.

The second methodologically significant study is conducted by Winton (2013). Winton (2013) uses RA to understand the persuasive arguments in 181 policy texts from Ontario School's *Character Matters Initiative* in Canada. By mapping how the argument for character education was constructed in the texts, Winton (2013) found that the initiative proposes that student character (but mostly their non-compliant behavior) is constructed as a concern for social cohesion, and argues for a traditional approach to character education. In addition, Winton found rhetorical analysis to be a fruitful method for the critical examination of policy. They give the following about what RA can bring to critical policy research. They argue that RA

- [1] aids understanding about why certain policies achieve widespread support [...]
- [2] helps explain why policies often perpetuate the issues they claim to address [...]
- [3] directs attention to how policies construct policy problems, their audiences, and individuals and circumstances the policies aim to affect [...]
- [4] encourages researchers to consider the context and timeliness of a policy response [which] can provide further understanding about why particular appeals are used [...]
- [And, 5] while rhetorical analysis can highlight differences between similar policies, it can also demonstrate how they are connected. (Winton, pp. 171 - 172)

With these closely related studies in mind, the gap in research not only becomes clear, but so too has a suitable method for filling it. Since the US is considered to have such polarization of political parties, there must be more research which examines the complexities of ideological difference and also bipartisan agreement. Furthermore, with the aim of creating a more equal and just society, there must also be research which exposes the boundaries of constructions and the ways they can be dismantled and reconstructed. While this type of research has been conducted in some areas of immigration policy, the CGP has been almost completely unexamined. RA appears to be well-suited to map the dynamics of borderscaping within the CGP to critically consider the ways in which immigrants are molded, citizens are formed, and national identity is performed.

4 Methodology

In any research project, it is important to choose a method (or methods) that are appropriate for the research questions. Qualitative methods are suitable in the humanities and social sciences when the research question seeks to understand something specific, rather than make a prediction or generalization (Given, 2008). As this project seeks to understand a particular policy in a particular context, qualitative methods are quite suitable. Indeed, the aim of the chosen qualitative method— RA— is not "to categorize persuasion for all times and all places" (Leach, 2000, p 6). The strength of RA is in "its immediacy, its ability to talk about the particular and the possible, not the universal and the probable." (p. 6).

Just as the research method must fit the research questions, it must also fit the research paradigm. As previously mentioned, this research is situated in the critical paradigm. Dating back to Aristotle, "the art of rhetoric" was used in political speeches in order to persuade the public to take action on a certain issue (Posch, 2018, p. 247). In contemporary times, rhetoric still plays an important role. It persuades audiences— through different means and over different mediums— "to accept and support particular constructions of reality, points of view, and courses of action" (Winton, 2013, p. 159). Furthermore both Leach (2000), Kock, & Villadsen (2017) and Winton (2013) understand it as a critical method— well poised to unpack arguments in politics and in policy and unveil the ideologies behind them. While much of the scholarship in the literature review focused on discourse, RA has been chosen— instead of Critical Discourse Analysis, for example— because of its suitability for my theoretical background. Whereas discourse is important to the study, discursive acts and the way they are enacted as rhetorical performances are my key area of focus. Thus, RA is more appropriate.

Last but not least, the research method must fit the data to be examined. The data for this research, policy documents, were chosen after considering my objective, the scope of the Master's thesis, the (lack of) previous literature on the topic, and research ethics⁸. Considering the precarious situations and marginalization of participants in activities funded by the CGP, I considered it most responsible to work with existing data instead of producing new data through, for example, interviews or participant observation. Having a vision for a future mixed-methods case study, I considered it important to have an intimate understanding of the

⁸ For research ethics, I principally refer to Shaw (2011).

CGP as a policy, before moving to interactions with human research participants. Thus, I sought existing data which would provide in-depth insight into the CGP and its operations, and a method that would help me to put that data into context. RA proved to be not only an appropriate tool, but a fruitful one as well.

4.1 Data

The data for this research consists of 147 pages from 22 policy texts which outline the CGP in detail. These texts are called Funding Opportunity Announcements (FOAs)⁹. When doing background research about the history of the program and the policy documents surrounding it, I determined the FOAs to be the most suitable data, as they are widely considered to be the CGP's main policy documents—circulated to promote the program to applicants and to explain what is expected of organizations who are funded.

FOAs have been issued every year of the CGP's existence and include descriptions of what the program should entail and how it should be carried out. The CGP has been around since 2009, but the number of texts outweighs the number of years of operation. This is because in several years, the CGP was split into several subcategories and there is an FOA for each. Each year, the FOAs are published in pdf form in grants.gov which is the online hub for all US federal grants. The FOAs are also shared on the USCIS website, under a specific section dedicated to the CGP (USCIS, February 18, 2021). However, several pdfs from the program's early years are now archived (USCIS, August 3, 2021) and their links are broken. In order to download all FOAs from the program's history, I used the search function in Grants.gov, cross checking the information with the USCIS website, and downloaded them to my personal computer. On the next page, I have provided a table (Table 1) with the names of each FOA and codes which help to identify the various iterations of the CGP. In addition, I have included the presidential administration as well as the political party which is responsible for each iteration. Citations for the FOAs can be found on the reference page based on their code. Each FOA reference includes a "Funding Opportunity Number" which can be used to easily locate each document in Grants.gov.

⁹ The texts are technically called Notice of Funding Opportunity (NOFOs) from 2015 onwards. Since the meaning is the same I have used FOA as the main label in this thesis, in order to make a clear reading experience.

The total page count of the 22 documents is 901, but only 147 pages were considered primary data in the analysis. The pages that are used are also listed in Table 1. In the background study of the project, I read the texts in total (except those texts which had not yet been published) and limited the data in order for it to fit the scope of the Master's thesis. While reading each document in total, I realized that much of the same information was repeated several times throughout the text and that the core information was at the beginning sections, leaving more minute administrative details to the end. In each document I decided to limit the data to the first page (which typically included "Overview Information") through the conclusion of the "Funding Opportunity Description". All other pages were considered secondary sources— not ignored completely but contributing to the surrounding context of the CGP rather than the main focus. In order for the reader to better understand FOAs, their contents, and how the data has been limited, I have also provided the FOA from fiscal year (FY) 2009 in the appendix (See Appendix A).

Table 1

Primary Data

Reference Code	Funding Opportunity Name/Program Name	Administration, Party	Total Pages	Primary Data
CGP2009	FY2009 Citizenship Grant Program	Obama, Democratic	37	1-5
CIGP2010CB	FY2010 Citizenship and Integration National Capacity Building Grant Program	Obama, Democratic	41	1-9
CIGP2010	FY2010 Citizenship and Integration Direct Services Grant Program	Obama, Democratic	42	1-6
CIGP2011CO	FY2011 Citizenship and Integration Direct Services Grant Program Citizenship Instruction Only	Obama, Democratic	50	1-11
CIGP2011	FY2011 Citizenship and Integration Direct Services Grant Program Citizenship Instruction and Naturalization Application Services	Obama, Democratic	50	1-6
CIGP2011CB	FY2011 Citizenship and Integration National Capacity Building Grant Program	Obama, Democratic	53	1-10
CIGP2012	FY2012 Citizenship and Integration Direct Services Grant Program	Obama, Democratic	25	1-5
CIGP2013	FY2013 Citizenship and Integration Direct Services Grant Program: Citizenship Instruction and Naturalization Application Services	Obama, Democratic	26	1-5

CIGP2014	FY2014 Citizenship and Integration Direct Services Grant Program: Citizenship Instruction and Naturalization Application Services	Obama, Democratic	26	1-5
CIGP2015	FY2015 Citizenship and Integration Direct Services Grant Program: Citizenship Instruction and Naturalization Application Services	Obama, Democratic	37	1-7
CIGP2016CO	FY2016 Citizenship and Integration Grant Program: Citizenship Instruction	Obama, Democratic	30	1-6
CIGP2016	FY2016 Citizenship and Integration Grant Program: Citizenship Instruction and Naturalization Application Services	Obama, Democratic	39	1-7
CAGP2017CO	FY2017 Citizenship and Assimilation Grant Program: Citizenship Instruction	Trump, Republican	33	1-4
CAGP2017	FY2017 Citizenship and Assimilation Grant Program: Citizenship Instruction and Naturalization Application Services	Trump, Republican	42	1-5
CAGP2018	FY2018 Citizenship and Assimilation Grant Program: Citizenship Instruction and Naturalization Application Services	Trump, Republican	46	1-6
CAGP2018RA	FY2018 Citizenship and Assimilation Grant Program: Refugee and Asylee Assimilation Program	Trump, Republican	50	1-10
CAGP2019	FY2019 Citizenship and Assimilation Grant Program Citizenship Instruction and Naturalization Application Services	Trump, Republican	43	1-5
CAGP2019RA	FY2019 Citizenship and Assimilation Grant Program Refugee and Asylee Assimilation Program	Trump, Republican	47	1-8
CAGP2020	FY2020 Citizenship and Assimilation Grant Program Citizenship Instruction and Naturalization Application Services	Trump, Republican	45	1-5
CAGP2020RA	FY2020 Citizenship and Assimilation Grant Program Refugee and Asylee Assimilation Program	Trump, Republican	55	1-9
CIGP2021	FY 2021 Citizenship and Integration Grant Program Citizenship Instruction and Naturalization Application Services	Biden, Democratic	40	1-5
CIGP2021RA	FY 2021 Citizenship and Integration Grant Program Refugee and Asylee Integration Services	Biden, Democratic	44	1-8

4.2 Method of Analysis

Now that the methodology and the data have been identified, I will dive into specifics. Here, I outline the particular way that RA is carried out in this study. Since RA of policy texts

is still fairly untraditional (compared to speeches, for example) it was important to find an approach that was appropriate for the data. For this reason, I followed the steps outlined by Leach (2000) who gives much consideration to textual data in combination with Kock, & Villadsen (2017)'s critical approach to RA— which they consider a form of "close textual reading" (p. 575). In addition, Winton (2013) utilized Leach's (2000) guidance in their rhetorical study. Winton's (2013) study provided me with a solid example of how RA can work to examine a policy that changes over time, and also how to examine multiple documents rather than just a singular text.

In their chapter in *Qualitative Researching with Text, Image and Sound*, Leach (2000) gives several examples of RA in praxis. With these examples, Leach outlines the typical features of the method but also showcases its malleability— even encouraging creativity. In fact, at the end of the chapter, Leach offers a disclaimer. They say that "rhetorical analysis tends to resist codification and every analysis differs just as every text differs" (p. 18). Nevertheless, Leach (2000) offers some starting points which I follow:

- 1 Establish the rhetorical situation for the discourse to be analysed.
- 2 Identify the types of persuasive discourse using stasis theory.
- 3 Apply the five rhetorical canons.
- 4 Review and refine analysis using the reflexive guidelines. (p. 18)

The rhetorical situation can be understood as putting the text into perspective (Leach, 2000). Traditionally, this is done in two main parts: by identifying the exigence and the audience. The exigence refers to what the data constructs as an urgent problem to be solved. Unpacking the exigence is meant to situate and contextualize the analysis, considering the problems that are constructed in the data and connected to their historical context. In doing this, I looked for problems which the documents stated explicitly, while also being alert to more subtle problems being constructed in the texts— recognizing that communication often has layers of meaning. In the second part of the rhetorical situation, the audience, I was guided by Winton (2013)— I sought to not only focus on who the audience is intended to be, but "how the audience is constructed by [the] policy" (p. 164). It is important to note that in establishing the rhetorical situation, the researcher is not limited to using the primary data (Leach, 2000). They can also use other relevant sources as evidence, situating the data in time and space. Therefore, when I present the results of the exigence and audience, I use other

policy documents surrounding the CGP—especially those hyperlinked in the FOAs themselves—to help interpret the findings and validate the interpretations.

Moving on to Leach's (2000) second step, status theory, determines that persuasive discourse falls into three main genres: forensic, deliberative, and epideictic (Leach, 2000). By identifying the genre or genres of the data, the researcher uses the context to better understand the purpose behind presented arguments. For example, courts of law are characteristic of the forensic genre— "interlocutors must persuade a third party that their account of past events is the 'true' account" (p. 7). In contrast to forensics, epideictic rhetoric is focused on the present and whether or not a person, group or event warrants praise or blame. Epideictic rhetoric is easily found at events like award ceremonies or protests. Arguing beyond the present, deliberative rhetoric looks ahead. The deliberative genre is often associated with "the arena of policy, where debate centres on the best possible course of future action." (p. 7). Although my data can easily be marked as deliberative simply because it is policy, persuasive genres should not be taken for granted. It is common that more than one genre is evident in a given text, and possible for texts to have all three (Leach, 2000). Therefore, I did not rule out any persuasive genre. I looked for indications of each within each text.

In the third step of RA, the researcher considers the different parts of rhetoric. These are often categorized into 5 rhetorical canons: invention, disposition, style, memory, and delivery (Leach, 2000). Considering these canons were originally applied to oral speeches, the categories have been adapted over time to apply to many types of data. In this study, I used the adaptations for documents recommended by Leach (2000) and Kock, & Villadsen (2017) and which are fleshed out by Winton (2013).

The canon of invention has to do with the types of appeals that are made in the data, and whether or not the arguments appeal to ethos, logos, or pathos (Leach, 2000). Ethos has to do with credibility. In my analysis, I looked for ways in which the data established credibility of the speaker in order to increase the validity of the argument. Easily identified by its name, logos is the appeal to logic. I also looked for ways in which the argument was aided by referencing statistics, graphs, and historical or traditionally scientific findings. Lastly, pathos has to do with emotions. In the analysis, I looked for instances that evoked or might be intended to evoke an emotional response.

Two of the remaining canons—disposition and delivery— have to do with how the text looks on the page. For the canon of disposition, I was concerned with how the text is ordered and arranged and with delivery I focused on visual tools such as bolding and italicizing, plus the use of repetition. While reading the data, I considered how both disposition and delivery aided the persuasive arguments. Overall, I was attune to the ways in which words and images were displayed and emphasized in the documents and how this factored into the power of the arguments.

In contrast to disposition and delivery, the last two canons — style and memory— have to do with the words that are used in the documents, considering the ways in which certain words are put together to conjure images, feelings, and actions. There are many ways style can be interpreted and many different stylistic elements to look for. Guided by Leach (2000), I chose to focus on the style conventions of the persuasive genre, considering what is typical or atypical for policy documents and more specifically FOAs. Additionally, like Winton (2013) I also looked closely at metaphors. Closely tied to the canon of style, is memory. While the canon of memory traditionally referred to how well the speaker had memorized their material, it is now considered differently by many RA scholars. Leach (2000) identifies "a revived interest in the cultural aspect of memory, and how particular discourses call upon cultural memories shared by authors and their audiences" (p. 11). When analyzing the text, I kept this in mind, considering not only what cultural memories may be shared but what memories the text assumes are shared.

In examining the rhetorical canons, Kock, & Villadsen (2017) remind the researcher to not only think about how texts are performed but how they "function [...], both when this coincides with an explicitly stated purpose by the speaker and when there is a difference between the explicit message and what is said or done implicitly" (p. 575). Therefore, the researcher is able to utilize the surrounding context to make claims about what might be intended. Furthermore, Kock & Villadsen (2017) note that while RA focuses much attention on the speaker and how the audience is constructed, the researcher should also consider the audience as hearer's and their agency to accept or not accept the presented arguments. In the discussion, I also take inspiration from Winton (2013) and after laying out how arguments are constructed, I reflect on them— not assuming that the arguments are accepted by everyone but considering the implications if they would be.

Even in their hesitation to give a straightforward approach, Leach (2000) offers four steps to get rhetorical analysts started. Yet, it is important to note that the last step implies a repetition— an order to go back to the beginning and reassess, making adjustments where needed and honing the findings and their interpretation over time. Leach (2000) also stresses the importance of researcher reflexivity in this process too, calling for the reader to continuously examine the data and their own assumptions and biases as well. Indeed, the process of analysis proved to be an iterative process, whereby reading the data over and over, I was able to extract more evidence, reveal complex layers of meaning, and dissect my assumptions. In practice, this meant pulling up the documents on my multiple screen desk setup (the digital equivalent of spreading the texts out on the floor) and highlighting aspects of the texts with different color codes to indicate what canon or genre appeared when and where. By repeating all of the steps outlined by Leach (2000) I was able to build nuanced evidence for the rhetorical situation. Moreover, I was able to go beyond the surface level and provide a rigorous examination of the explicit and implicit arguments in the data.

4.3 Validity, Reliability and Ethics

According to Leach (2000), RA necessitates reflexivity in order to increase its validity and reliability. Unlike other areas of research, critical research does not aim for objectivity, but uses reflexivity in order to expose the "strengths and weaknesses of the analyst" (p. 12). Indeed, it is an important step in Leach's four guidelines for RA, so it should not be ignored. While reflexivity will also be brought up in the discussion section, some will be presented here, unpacking my relationship with the topic and how that might affect my research.

As stated in the introduction, I was familiar with the CGP before embarking on this research project. Certainly, my experiences with the CGP as a volunteer and as a paid staff member in a immigration services organization inspired me to explore the grant program more closely. Having discovered some incompatibility between the grants requirements and the practical needs of my organization's clients I did head into this research with concerns about the inclusivity of the CGP. At the same time, as a middle class white woman, in my 20s, who was born with US nationality, I was also had self-concern about how my own working norms and thoughts about citizenship might differ from my non-white co-workers, who had a closer proximity to immigration than I, and also differ from the immigrant participants enrolled in

with the organization's services. In other words, I had conflicting emotions about my time working with US citizenship acquisition.

My conflicted emotions were aided by a deep respect for the organization's work to get immigrants the official status of citizen and the multilingual and multicultural environment which was cultivated, coupled with a mistrust for the overarching town culture which viewed immigrants as an asset as long as they were doing work that no US citizen wanted to do. Thus, I became confused by and suspicious of the bipartisanship celebration of citizenship classes in our rural town. I became suspicious of our many supporters, including the many politicians that wanted to come to class to tell immigrants about their value in the community, and many police officers that wanted to speak about how best to contribute to community safety.

Certainly, my experiences in this organization impacted my decision to explore my research topic with a desire to understand the purpose of citizenship preparation and the grant programs that fund it. These experiences also impacted my decision to work with policy, wanting to understand the overarching structures which influenced the daily operations of the organization and the livelihoods of the immigrants involved with our activities. While in some ways, I think my personal surrounding the CGP has positively informed my ethical considerations— making me deeply consider how my work might affect people and organizations in precarious positions, personal and emotional attachment can also be a double edged sword. While reflexivity is a tool to disclose biases in order to make it easier to map their potential impact in the analysis, I also attempted to reduce the impact of these biases.

One of the reasons why I chose RA as a method— over Critical Discourse Analysis or Thematic Analysis, for example—was so that I would not codify data in themes that stood out to me based on my own interests or judgement. Using RA, I coded information from the data based on the categories outlined by Leach (2000) and subcategories of the canons. Thus, even when I was limiting the data, I was even considering the rhetorical canons (especially using the canon of delivery) to identify which information was relevant or important to the study. Additionally, in order to strengthen perceived validity, I utilized a validation tool that Cresswell and Miller (2000) outline for the constructivist paradigm; In order to appeal to readers who may be skeptical of research which includes personal reflections on the individual researcher, I provide a "thick, rich description" of the data in the analysis (p. 128). While it is likely a result of imposter syndrome, my hope is that it clues the reader into my line of reasoning, allowing them to map how I end up at my conclusions.

While ethical considerations have been mentioned concerning the choice of my data and method, I did also consider whether it was ethical or not to give personal reflections which connect me to an immigration organization and to people who participate within it. Just as I disclosed an overview of my personal connections, conflicts and biases, I must also disclose that they are mine and mine alone. My analysis in no way reflects the opinions of those currently working or participating in activities in any organization and are in no way meant to represent them.

5 Analysis

In this section, I give an in-depth look into my rhetorical analysis of the CGP. As mentioned previously, the analysis was an iterative process and many of the rhetorical canons informed the persuasive genre and the rhetorical situation. However, to make for a digestible reading experience, the results will be presented in the order of Leach's (2000) steps, beginning with the rhetorical situation, moving to the persuasive genres, and ending with the rhetorical canons. Throughout the analysis, I provide excerpts from the data along with my interpretations. Any bolding or italics found in the excerpts is taken directly from texts themselves. In contrast, underlining will be used as my own tool for emphasis.

5.1 The Rhetorical Situation: Exigence

Since the rhetorical situation is made up of two parts—exigence and audience—I begin with the exigence, identifying the key problems that are constructed by the data and revealing layers of explicit and implicit meaning. In analyzing the texts, I found that four subproblems arose. Thus, I have split this portion of the analysis into four third-level subsections: inactivity (a lack of citizenship), unfit (the inability to adapt), lawlessness (threats to the law and the lawful), and disorder (lack of professionalism). However, the aforementioned categories and their findings are not mutually exclusive. Indeed, the constructed problems build upon one another and the reader should be prepared to discover their overlap.

5.1.1 The Problem of Inactivity: A Lack of Citizenship

Across all iterations of the CGP, a key point of emphasis lies with citizenship. An explicit example comes from the data's most visible and widespread text, the program's title. Just as with a book or with a speech, the title is a sneak peak of the content to come. In this way, titles are both introductions and summaries, preparing the audience's expectations. While the program's title changes significantly throughout the 11 years of its existence, there are two portions which have been accepted without contest, "Citizenship" and "Grant Program". When the program was first introduced in 2009, the title was just that— "**Citizenship Grant Program**" (CGP2009, p. 1). While "Grant Program" tells what the policy is, "Citizenship", on the other hand, tells what the policy is about. Over the many iterations of the CGP— even

when other words are added to the title—, the word citizenship is a key fixture and alerts the public to a continuous problem that the policy aims to tackle through grant funding.

Beyond the program title, the problem with citizenship is further constructed throughout the data. I quickly discovered that the problem with citizenship is the lack of it— especially among "the nation's immigrant population" (CGP2009, p. 1). A lack of citizenship is illustrated in the data by the main goal of the grant program, which is stated in a similar manner throughout each iteration and worded exactly the same from 2013 - 2021: "to expand the availability of high quality citizenship preparation services" (CIGP2013, p. 4). This stated goal implies that immigrants' citizenship is not to the desired standard.

The proposed solution to the lack of citizenship is citizenship preparation services. Yet, I further unpack what those services entail in order to identify what is assumed to be lacking and flesh out the image of citizenship which the policy seeks to promote. When the CGP started, in 2009, citizenship preparation appeared to be an endeavor revolving around the *10 Steps to Naturalization* (See again, USCIS, January 2021); What is seen as lacking are the skills to navigate this process. In this year, too, there is acknowledgement that different individual immigrants and even certain immigrant groups may not need all of the services. In fact, there are no strict requirements for the exact components of preparation:

Specific services to be provided may include but are not limited to, English as a Second Language (ESL), English Language (EL)/Civics, citizenship instruction, educational resources (textbooks, language software, computers, etc), assistance with preparing and completing the naturalization application process (including case management), citizenship-focused community outreach, and staff and volunteer training. (CGP2009, pp.1-2).

This flexibility leaves room to accommodate the needs and wishes of the particular immigrants enrolled in each community. In the 2009 text, I find that the focus of citizenship is having the legal status of a US national and the social status of a US citizen. Therefore, in 2009 the problem with citizenship is a lack of status and the lack of skills (language, civic knowledge, technological, etcetera) or lack of resources (financial or otherwise) to obtain it without support.

Despite the flexibility of the CGP in its original form, the contents of citizenship preparation are more rigid after 2009, even when the main goal stays the same. Although the following iterations of the CGP still contain citizenship preparation for naturalization, it becomes clear that naturalization is no longer the ultimate outcome of the program, nor the

main focus. The following years solidify that building the active element of citizenship is considered more important than obtaining the legal status of nationality.

The privileging of citizenship over naturalization can be seen straight away in 2010 with the mandatory inclusion of citizenship education and the secondary, voluntary, inclusion of naturalization preparation:

Proposed activities **must include a citizenship education component** consisting of citizenship or civics-focused English as a Second Language (ESL) instruction and citizenship instruction (U.S. history and government) to prepare LPRs for the civics, English reading, writing, and speaking components of the naturalization test. In addition to the mandatory citizenship education component, grant funds **may be used to provide naturalization application preparation services**, including legal services (within the scope of authorized practice of immigration law) and case management services to support the naturalization application and interview process. (CIGP2010, pp.1-2, original bolding, underline added)

Indeed, 2010 provides precedent for the mandate of certain components of citizenship which are assumed to be relevant for immigrants with barriers to naturalization. These components are: English—being able to read, speak, and write the English language— and civics—having knowledge about US history and how the US government operates. Certainly, in many cases this content does directly relate to that needed to get through the naturalization application and interview, yet, some immigrants do not need these skills in order to naturalize. For immigrants who are eligible for a language exception or for a disability accommodation (, this mandated content of this citizenship preparation would not relate (USCIS, June 5, 2020). Participation would not directly aid their acquisition of national status but it would promote the CGP's definition of citizenship. In this way, the CGP becomes less flexible and accommodating than the naturalization process itself, pushing the tenets of Salins' (1997) assimilation contract from 2010 onwards.

Although both the terms naturalization and citizenship can be found throughout the data, it is clear that citizenship— with its participatory emphasis — is the object of interest and not the acquisition of nationality. Another way this can be seen, is by the way the program is split from year to year. While every year there is a grant that requires citizenship instruction— sometimes only requiring that— naturalization application assistance is only required from 2012-2021. Even in these later years, naturalization is required in conjunction with citizenship instruction. Moreover, there is no year where the grant funds naturalization assistance without also demanding participation in citizenship classes.

That citizenship is the focus is illustrated particularly well in 2012, one of the years in which naturalization assistance is, in fact, a requirement:

Naturalization is not only a benefit in itself, but also a mechanism to foster immigrant integration. Naturalization provides civic and economic opportunities for new citizens, and strengthens our communities and nation as a whole. Through preparing for naturalization, applicants will gain the tools to become successful citizens – ready to exercise their rights and meet their responsibilities as United States citizens. (CIGP, 2012, pp. 3-4).

In this iteration, it seems that the intention behind the naturalization process is not to only grant a benefit, but to use the naturalization process and the preparation to pass it— as a means for molding 'successful' citizens. Here, success is determined by an immigrant's abilities and actions surrounding rights and responsibilities. Although responsibilities are typically seen as active and rights seen as inactive (or given), in this excerpt it seems that rights are only given power when exercised by the immigrant. The immigrant is seen to have responsibilities which can only be met through this exercising, implying an active maintenance in order to be a successful citizen. This example further solidifies that after 2009, the CGP constructs citizenship as primary and naturalization as secondary and further constructs inactivity as a major problem that the CGP wishes to tackle. While national status may be the immigrant's ultimate goal, the state's goal goes beyond that.

5.1.2 The Problem of Unfitness: The Inability to Adapt

With the aforementioned examples, the lack of immigrant citizenship is a consistent matter of concern in the CGP. Yet, there are discrepancies about who is responsible for that lack and debate about how the problem affects social cohesion. Here, the battle between integration and assimilation comes into play. Expanding on the problem of inactivity, the problem of immigrant unfitness is also consistently constructed in the data. However, it is constructed differently depending on the year and government administration. Again the program's title provides much insight.

Despite the use of the word integration throughout the 2009 FOA, the title did not include it. After 2009, the title of the CGP was expanded and from 2010 to 2016, the title became the *Citizenship and Integration Grant Program*. Then, from 2017 to 2020, it changed to the *Citizenship and Assimilation Grant Program* and back again to *Citizenship and Integration Grant Program* in 2021. The addition of another word to the CGP— whether integration or assimilation— clues the reader into a problem that is more than lack of

citizenship, highlighting an assumed connection between citizenship, adaptation and incorporation. Both additions to the title construct a problem that some immigrants are not full participants in the US society. That being said, integration and assimilation indicate differences about why citizenship is lacking and how that connects to their limited adaptation.

When it first began, the CGP was targeted towards "*priority immigrant groups*" (CGP2009, p. 5). These groups were broken down as such:

- Legal Permanent Residents (LPRs) sixty-five years or older who are eligible, or soon to be eligible, to apply for naturalization;
- Refugees or asylees that have adjusted status to legal permanent resident (LPR) and are eligible, or soon to be eligible, to apply for naturalization (For a definition of “refugee” and “asylee” see Attachment C)
- Those persons that have adjusted to legal permanent resident (LPR) status under the Violence Against Women Act (VAWA), U or T Visa, or Special Immigrant Juvenile Visa Status and are eligible, or soon to be eligible, to apply for naturalization (For a description of VAWA and definitions of the U or T Visa and Special Immigrant Juvenile Visa Status, see Attachment C);
- Other disadvantaged groups as defined and justified by the proposing organization. (CGP2009, p. 5)

From the excerpt, it seems that priority was with immigrants who were deemed 'disadvantaged'. The listed groups are constructed having problems with citizenship due to matters outside their control, rather than being problems themselves. Because the fault lies outside the immigrant, these groups are deemed deserving of support. They are not only eligible for the program and its services, but the target participants.

After 2009, with the newfound emphasis on citizenship as it relates to adaptation rather than citizenship as it relates to national status, the section about "*priority immigrant groups*" (CGP2009, p. 5) goes away— minimizing the targeted effort to assist those who have the biggest barriers to naturalization. Yet, for many of the integration years to follow, the emphasis on assisting disadvantaged groups does not go away completely. For example, in 2012:

The goal of the grant program is to expand the availability of quality citizenship preparation services for permanent residents in communities across the nation. Activities that support this goal include making citizenship instruction and naturalization application services accessible to low income and other underserved permanent resident populations; developing, identifying, and sharing promising practices in citizenship preparation; supporting innovative and creative solutions to barriers faced by those seeking naturalization; increasing the use of and access to technology in citizenship preparation programs; and engaging receiving communities in the citizenship and civic integration process. (CIGP2012, p. 4)

I find that wherever barriers are mentioned, so too is creativity or flexibility, implying that certain immigrants deserve more individualized and accommodating attention if they prove to be disadvantaged. However, it becomes evident that assistance with barriers is not the primary focus. In 2013, this is made more clear:

The goal of the Citizenship and Integration Grant Program is to expand the availability of high quality citizenship preparation services for lawful permanent residents in communities across the nation. Additional activities that support this goal include making citizenship instruction and naturalization application services accessible to low-income and other underserved lawful permanent resident populations; developing, identifying, and sharing promising practices in citizenship preparation; supporting innovative and creative solutions to barriers faced by those seeking naturalization; increasing the use of and access to technology in citizenship preparation programs; and engaging receiving communities in the citizenship and civic integration process. (CIGP2013, p.4).

Just as naturalization becomes secondary in the CGP, barriers become secondary too. In integration-years they are an additional goal, but when assimilation is brought forth they are not a focus at all. A stark contrast can be seen beginning in 2017:

The goal of the Citizenship and Assimilation Grant Program is to expand the availability of high quality citizenship preparation services for lawful permanent residents in communities across the nation and to provide opportunities for lawful permanent residents to gain the knowledge and training necessary to promote their assimilation into the fabric of American society. Additional activities that support this goal include developing, identifying, and sharing promising practices in citizenship preparation[.] increasing the use of and access to technology in citizenship preparation programs; working with local libraries which serve as a vital resource for immigrant communities; and incorporating strategies to foster welcoming communities as part of the citizenship and civic assimilation process. (CAGP2017, p.2)

There are several things that are jarring about the 2017 text—for example, the use of assimilation in almost every line— but for the purpose of this section, I will not elaborate on what has been added but address what has been removed from the previous year. In 2017, there is no text that denotes barriers to citizenship or implies that the program will help immigrants to overcome those barriers. Whereas integration-based CGPs gave some acknowledgement of external barriers to citizenship, assimilation-based CGPs do not.

There is one aspect of assimilation-based CGPs which indicates some acknowledgement of barriers. This can be seen in the program offshoot that begins in 2018, the *Citizenship and Assimilation Grant Program: Refugee and Asylee Assimilation Program*. In the section entitled "**Program Overview, Objectives, and Priorities**" the document says:

USCIS recognizes that naturalization is a culmination of the civic assimilation of LPRs who were resettled as refugees or granted asylum, however, some of these individuals may experience challenges with aspects of civic, linguistic, economic, cultural, and institutional assimilation when resettling in the United States, which may impact their progress toward full civic assimilation. The earlier refugees and asylees are able to engage in their community, the more likely they are to find satisfaction and success in their personal and professional lives; the more likely they are to make positive contributions to their communities and the Nation; and the more likely they are to become naturalized citizens. It is critical to provide former refugees and asylees with opportunities to gain the knowledge and skills necessary to fully assimilate into U.S. society. (CAGP2018RA, p. 2).

Here, I find that one of the targeted groups from the original CGP is given priority yet again, this time with its own subprogram. This indicates several things: that refugees and asylees have certain barriers that are seen to be unique to other immigrant groups and that refugees and asylees are credited with a certain level of deservingness for assistance. Again, this deservingness seems to be predicated on the idea that a lack of citizenship and adaptation is based on factors that are considered, to some degree, outside the immigrants' control.

Like the CGP in 2009, the refugee and asylee offshoot acknowledges that different program participants may want and need very different services. This is indicated with the requirement that all the program participants receive assistance based on an individualized assimilation plan. However, there are still some strict requirements. Again, naturalization assistance is proven to be an additional service, which is only to be after, or in tandem with, citizenship preparation.

Other differences between integration and assimilation versions of the CGP are easily seen when examining texts on either side of the name change, side by side. For example, in 2016 the data states:

Naturalization requirements, such as knowledge of English and of U.S. history and civics, encourage civic learning and build a strong foundation upon which immigrants can exercise their rights and responsibilities. Through preparing for naturalization, immigrants will gain the tools to become successful citizens—ready to exercise their rights and meet their responsibilities as United States citizens. (CIGP2016, p. 2)

Then, in 2017, the same paragraph was edited:

"Naturalization requirements, such as knowledge of English and of U.S. history and civics, encourage civic learning and build a strong foundation upon which immigrants can fully assimilate into society. Through preparing for naturalization, immigrants will gain the tools to become successful citizens—and assimilate into our society and meet their responsibilities as United States citizens." (CAGP2017, p. 2)

In both excerpts, the naturalization process is presented as a process intended to cultivate citizenship. However, in 2016, citizenship includes rights and responsibilities and in 2017, rights are removed from the text—taking away the responsibility of the state to protect rights, and placing sole responsibility on the individual immigrants. Throughout the data I find that integration-based documents place the problem of immigrant incorporation amongst immigrants and society, and in assimilation-based documents, the onus is primarily on the immigrant.

Additionally, in 2017 a new component is added to the CGP. The addition is mandatory "civic assimilation learning activities" (CAGP2017, p. 3). These activities are broken down into four suggested categories: which are 1. site-based, 2. classroom-based, 3. civic participation, and 4. Other. With this change, the intent is made explicit:

The intent of this requirement is to encourage students to extend knowledge acquisition beyond traditional classroom instruction through opportunities to experience and navigate American civic life firsthand and through in-depth learning activities. (CAGP2018, pp. 3-4)

With this intent, there is an assumption that the program participants are not already navigating life in the US, even though they must, everyday. The data constructs immigrants as being outside the 'true American reality' and constructs the problem of incorporation as something that should not only be overcome in the classroom but out in the community. The idea seems to be that assimilation is not only "taught" but "caught" (as Brooks & Holford describe, 2009, p. 95) through experiential learning. It situates the problem of adaptation not only with knowledge of group norms but the ability to carry them out, and blend— or fit— into society.

With the excerpts provided in this subsection, it appears that the problem of citizenship is placed in close connection with the problem of adaptation— even taking it one step further. While all iterations of the CGP identify that many immigrants are not full participants in US society, depending on the year and the integration or assimilation-based approach of the CGP, the assumed reason for the limited participation is different. In years with language of integration—Democratic years— a two way process is constructed, where immigrants and the state share responsibility for full incorporation. In contrast, assimilation-based years— under Republican administration— construct a one-way process where many immigrants are not full participants in US society because they have not 'done the work' to fully adopt 'American culture'. Cutting through these divides is an area of agreement— that certain immigrant

groups deserve state assistance in their incorporation, while some are deemed undeserving and therefore, ineligible for participation in the CGP.

5.1.3 The Problem of Lawlessness: Threats to the Law and the Lawful

Another major problem that is intertwined with those previously outlined has to do with the law. I have argued that in the CGP different groups of immigrants are considered to lack citizenship more than others. Yet, there is one group that is assumed to lack citizenship the most. Throughout the CGP, the group of immigrants whose citizenship is constructed as most problematic is that of law-breaking immigrants, especially those who have broken laws in their immigration to the US.

On page one of the first FOA in 2009, it states that "funds may only be used to provide direct services to immigrants with legal status in the United States." (CGP2009, p. 1). Indeed, in each iteration of the CGP, the data makes clear that no money can ever be used to support services for undocumented immigrants. This exclusion constructs undocumented immigrants as the most lacking of citizenship, so much so that they are beyond the scope of assistance. This fits with Gerken (2013), García Hernández (2021), and Yukich (2013)'s findings that in the US, both political parties construct barriers of exclusion using 'legality' and 'illegality'. Indeed, in the CGP, undocumented immigrants are consistently constructed as the opposite of deserving, a threat to citizenship, and the antithesis of a model citizen.

Not only is the problem of citizenship constructed in the damning of the 'illegal', but it is also constructed in the promotion of the 'legal'. While early on in the CGP "legal permanent resident" (CGP2009) was often used to describe those immigrants who were eligible for the program, beginning in 2012, "lawful permanent resident" or "lawful immigrant" (CIGP2012) becomes the term of choice. On the surface level, 'legal' and 'lawful' appear synonymous, however, there are nuanced connotations the different terms enact. Adding 'ful' to the end of a word is a way to form adjectives of nouns, as a way to show that a person, place or thing is full of something. Thus, legal is pertaining to the law, and lawful is being full of law. Again, the data constructs a move away from a static status—legal—and an emphasis on the active character of citizenship—full of law. In this respect, those who have not upheld the law in their immigration to the US are not only considered 'illegal' but lawless. Through their exclusion from the CGP, they are constructed as undeserving and ineligible based on their own actions and faults, in stark contrast to, for example, refugees or asylees. Yet, those who

have immigrated to the US within a legal framework are not free from suspicion. In the data, they are constructed as legal risks, suspects of lawlessness.

An interesting development surrounding the term lawful comes again from switch to assimilation in 2017. For example, in 2016 the data says:

Due to the strong relationships [community-based] agencies often have with immigrants in the local area, these organizations can assist USCIS in its effort to reach underserved populations. (CIGP2016, p. 2, underline added)

Then, in 2017, underserved populations is replaced with "lawful permanent resident populations" (CAGP2017, p 2). Here, it seems that in assimilation-based CGPs, one common way of removing barrier-ridden language is to simply replace it with more lawfilled language. This example further illustrates a trend that minimizes deservingness based on disadvantage and emphasizes it based on character and behavior that is considered culturally appropriate and 'morally upright'.

Another aspect around the problem of law is constructed in the CGP but influenced by matters above it. This has to do with the CGP's leadership and how the policy is situated among organizational mission statements. While the stated goal of the CGP is to expand citizenship preparation services, this goal takes space underneath several overarching departments, and is attached to their departmental missions. One mission to which the CGP is attached is that of the OoC. In all iterations, the FOAs outline the mission of the OoC. In fact, from 2011-2021, it was presented in the exact same way:

The Office of Citizenship (OoC), within U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS), is charged with promoting the rights and responsibilities of citizenship. (CAGP2021, p. 1)

Despite some slight malleability early on, I find the OoC's mission to be quite static. In fact, when 'rights' are removed from other text in the assimilation-based documents they stay in OoC's mission. Additionally, in every iteration of the CGP, I find that the OoC's mission is situated among other organizing government bodies, underscoring its connection and attachment to them.

Although the organizational mission of the OoC does not not speak of the law, the mission of DHS does. The mission of DHS is not specifically mentioned in many years of the CGP, but there are several years where it is presented in the data and explicitly connected to it. 2012 provides the first instance, when the document outlines how the CGP tackles a matter of priority in the DHS's *Presidential Policy Directive/ PPD-8: National Preparedness* (2011)— a

plan "aimed at strengthening the security and resilience of the United States through systematic preparation for the threats that pose the greatest risk to the security of the nation" (Homeland Security, August 14, 2018, para. 1). The 2012 FOA outlines the CGP's connection as such:

[the CGP] does not directly address a priority area implemented by PPD-8. However, the program fully supports the following QHSR mission, goal and objective:

Mission 3: Enforcing and Administering Our Immigration Laws

Goal 3.1: Strengthen and Effectively Administer the Immigration System

Objective: Promote the integration of lawful immigrants into American society. Provide leadership, support, and opportunities to lawful immigrants to facilitate their integration into American society and foster community cohesion. Homeland Security partners and stakeholders must work collectively to provide strategies that respect newcomers while encouraging and assisting eligible immigrants to naturalize. Communities that are home to lawful immigrants must have the necessary tools to engage lawful immigrants in civic activities and community issues. New lawful immigrant communities should be encouraged to become an integral part of American life. For their part, new lawful immigrants must obey all applicable laws and take affirmative steps to fully join their new society. This includes learning English and the civic principles that form the foundation of responsible citizenship. Promoting integration reinforces a resilient public where all people belong, are secure in their rights, are confident to exercise their civil liberties, and have opportunities to be full participants in America. The integration process ensures a stronger and more cohesive American society by inviting newcomers from every background to share in our core beliefs and be able to embrace the rights and responsibilities of citizenship. (CIGP2012, pp. 4-5)

Here, there is a robust explanation of the CGP's connection to DHS which has not been provided before. This reveals some underlying aims which were likely present in earlier years, but had previously gone unspoken. For example, this excerpt implies a direct connection between lawfulness, English language skills, and civic knowledge and an ideal citizenship, which here is called, "responsible citizenship". The excerpt also shares an underlying belief that responsible citizens contribute to the safety, resiliency, and cohesion of society. While the text does show a two way responsibility, where communities are responsible for being respectful and helpful to 'lawful' newcomers and those newcomers are responsible for taking "affirmative steps", I do not find any indication that this encourages the two-way *cultural* process that integration is thought to promote. In fact, there seems to be no flexibility of

culture. The integration-based text seems to uphold assimilationist principles whereby immigrants can only be accepted if they participate in society in a very particular way.

As mentioned previously, DHS's mission is not referenced in every iteration of the CGP. In 2013, the explanation is removed and only comes back in 2015. This time, it is in a condensed, summarized version:

The Citizenship and Integration Grant Program addresses the following DHS mission as specified in the Quadrennial Homeland Security Review (QHSR):

Mission 3: Enforce and Administer Our Immigration Laws

Goal 3.1: Strengthen and Effectively Administer the Immigration System

- Promote lawful immigration;
- Effectively administer the immigration services system; and
- Promote the integration of lawful immigrants into American society. (CIGP2015, p. 2)

The mission is removed again in 2017, but it returns in 2019 in yet another shortened version. In both these summarized versions, DHS's mission is provided in reference to *The 2014 Quadrennial Homeland Security Review* (QHSR) (Homeland Security, 2014), an assessment of the effectiveness of DHS and its departments to 'secure the homeland'. In order to illustrate the context, an excerpt will be provided from the secondary source of the QHSR:

Enforce and Administer Our Immigration Laws. We will continually work to better enforce our immigration laws and administer our immigration system. We support common-sense immigration reform legislation that enhances border security, prevents and discourages employers from hiring undocumented workers, streamlines our immigration processing system, and provides an earned pathway to citizenship for the estimated 11.5 million undocumented immigrants in this country. It is indeed a matter of homeland security and common sense that we encourage those physically present in this country to come out of the shadows and to be held accountable. Offering the opportunity to these 11.5 million people—most of whom have been here 10 years or more and, in many cases, came here as children—is also consistent with American values and our Nation's heritage. We will take a smart, effective, and efficient risk-based approach to border security and interior enforcement and continually evaluate the best use of resources to prioritize the removal of those who represent threats to public safety and national security. (Homeland Security, 2014, p. 7)

There are many things which are interesting about this excerpt, but what is new to the analysis is that in the QHSR there is robust discussion about undocumented immigrants. While on one hand there is discouragement from hiring them, on the other there is an emphasis on finding pathways to citizenship for undocumented immigrants, especially those who have been in the US for many years. Here, there is some acknowledgement that undocumented immigrants do participate in society even without legal status. Here deservingness for assistance seems to be

predicated, not on disadvantage, but the length of duration on US governed territory and the large number of people who are in this situation. Still, there is some level of deservingness which links to matters that are deemed outside of the immigrants control— considering whether or not an immigrant came as a child.

In the QHSR excerpt a problem with the law is constructed, but constructed differently than in the CGP. The threat of immigrant lawlessness is made even more threatening because it is lurking in the shadows. Here, the threat to security is that the lawless are intermingling with the lawful, making it nearly impossible to distinguish between the two. In other words, the state does not know where the model citizen ends and anti-model citizens begins, and this is deemed a problem. However, the proposal of pathways to citizenship for undocumented immigrants not only proves that citizens are hard to distinguish, but it also shows that the borderscapes of legality are not set in stone, open to reconstruction. In fact, it seems that the review does not claim that all undocumented immigrants are worthy of citizenship, just the ones who aren't lawless in other ways. Waerniers & Hustinx (2019) labyrinth metaphor seems as relevant as ever here, trying to identify immigrant pathways to citizenship among confusing and conflicting categorizations. While it might seem tangential to give so much space to a secondary text that is merely referenced and linked in the data, excerpt from the QHSR provides insights for the context of the CGP. Although contextual information typically makes matters more clear, in this case it makes the CGP puzzling. Whereas pathways to citizenship for undocumented immigrants are priorities under DHS's mission in the QHSR, the CGP makes no mention of it. This might indicate that undocumented immigrants would need to be considered lawful permanent residents before ever coming in contact with the CGP.

Certainly the problem with the law is quite complex and the borders of deservingness are constantly contested. Yet, it is important to note that in the CGP the problem of lawlessness is not only a problem constructed among immigrants, but also those organizations and their employees which are applying for funding. As seen in the QHSR, there is an emphasis on making sure that undocumented immigrants are screened by employers. This emphasis makes its way into the CGP with the introduction, then requirement, of the E-Verify. E-Verify is a system which checks whether or not a person is allowed to work in the United States (E-Verify, n.d). Although E-Verify is voluntary throughout most of the US, it became a potential criteria for selection for the CGP in 2018 and from 2019-2020 it was a requirement of all CGP applicants. This shows that it is not only program participants that are suspect of

law-breaking, but organizational leaders are a risk too. In the 2021 version of the CGP, E-Verify is removed as a requirement, yet is still encouraged in the grant's operations.

5.1.4 The Problem of Disorder: A Lack of Professionalism

There is one more subproblem that is constructed in the data— the problem of disorder, or in other words, a lack of professionalism. In the aforementioned examples, the data shows program requirements becoming more rigid as the CGP goes on. The trend towards professionalization can also be clearly seen with the CGP's early offshoots. In 2011 and 2012, the CGP contained a 'National Capacity Building' component aimed at growing the number of professional citizenship preparation providers. The concept was to award funding to "national, regional, or statewide" institutions which would mentor several emerging organizations so they could conduct citizenship preparation services on their own in the future (CIGP2011CB, p. 3).

In addition to these several years of targeted capacity building, the push toward professionalization can also be seen in the required contents of citizenship preparation services which become increasingly specific and monitored. Indeed, beginning in 2013, the citizenship education curriculum was monitored by the National Reporting System (NRS) (NRS, n.d.) which is described as the "accountability system for the Federally funded adult education" (para. 1):

Program design must include the use of a nationally normed standardized test of English proficiency for student placement and assessment of progress, and the provision of at least 40 hours of citizenship instruction over a 10-15 week class cycle for students at or below the NRS1 high beginning level and at least 24 hours of citizenship instruction over a 10-15 week class cycle for all other students. (CIGP2013, p. 4)

From 2013 onward, the NRS becomes a staple in the CGP, making grant funded organizations subject to quality monitoring and program participants subject to standardized testing. In addition to requiring certain tools for teaching, the CGP began to require more and more qualifications from teachers. A high level of expertise is readily apparent in the 2016:

Through this funding, USCIS will fund community-based organizations striving to professionalize and increase services to immigrants in the area of citizenship instruction. Verifiable experience in the provision of English as a Second Language (ESL) programming is required to qualify for this funding opportunity. Applicants are required to use existing expertise in ESL instruction to provide citizenship instruction. CIGP2016CO, p. 2).

Even if organizations have verified expertise, still the experts are highly monitored and their teachings are controlled. In 2016, all applicants are required to give a copy of the curriculum for review by the OoC and must be willing to change it, if it is deemed unacceptable. In addition, the organizations are required to hit numerical benchmarks in many areas:

The proposed citizenship instruction program must prepare lawful permanent residents for the naturalization test and interview and must include:

- Instruction in U.S. history and government;
- English as a Second Language (ESL) instruction in reading, writing, and speaking;
- Instruction on the naturalization process and eligibility interview;
- The use of a nationally normed standardized test of English proficiency to place and assess progress of all students enrolled under this program. At least 80% of post tested students must demonstrate education gains as evidenced by increased standardized test scores;
- The provision of at least 40 hours of citizenship instruction over an 8-15 week class cycle with managed enrollment to at least 125 students at the National Reporting System for Adult Education (NRS) low beginning to high intermediate level; and
- The use of citizenship teachers who have at least one year of experience teaching ESL to adults. (CIGP2016CO, pp. 3-4).

For many participants, these standards could increase the quality of education they receive and it could also potentially stop some teacher bias from entering the curriculum, as was seen in Chao's (2020) research. On the other hand, the emphasis on quality instruction and education gains may slow down the process of obtaining naturalization, increasing a period of precarity for immigrants. Yet, as previously discussed, a slower naturalization process for immigrants does not affect the outcomes desired by the CGP— which is preparing eligible immigrants not only to pass the official test but ace the cultural exam. Thus, the US government defines what quality in education means and considers a prolonged education process pertinent to the CGP's desired outcome.

Whereas professionalism in the CGP can be more easily argued to benefit immigrants in integration years, by the time assimilation comes in, professionalism more explicitly defines cultural borders and screens certain immigrants who might have been eligible for assistance in earlier years. This is where the requirement that services be only conducted in English— which I mentioned in the introduction of this thesis— comes into play. By 2017, the organizations have very little flexibility to assess what their students need, including whether or not services in a language other than English are appropriate. While many program new requirements are added to the CGP in 2017, they are expanded on even more in 2020. In the

2020 iteration, the requirements for citizenship instruction expand so much in size that they more than triple what was in the 2016 FOA. The 2020 stipulations are illustrative, and will be presented below, because of the excerpt's length, only the beginning will be given and the rest of the section will be presented in full in the appendix (See Appendix B):

Citizenship instruction to prepare lawful permanent residents for the naturalization test and interview. Program design must include:

a. Instruction in U.S. history and government for test preparation and the promotion of civic assimilation in English. Applications to provide instruction in languages other than English will be deemed ineligible;

b. Activities that promote civic and linguistic assimilation; (CAGP2020, pp. 2-3)

From the 2020 excerpt, I find that professionalism of the CGP is emphasized at length, setting increasingly strict requirements about the content of citizenship instruction and how it should be carried out. In tandem, cultural demands become stricter too.

The increasingly stringent demands for professionalism are not found solely in the requirements for citizenship classes. They are also found in the requirements for naturalization application services, and found early on. In 2010, the CGP began to encourage naturalization services providers to professionalize in order to better work "within the scope of authorized practice of immigration law" (p. 5). Funds from the grant were allowed to go towards becoming accredited to conduct legal services under the Board of Immigration Appeals (BIA). In 2017 this accreditation switched to the Department of Justice (DOJ) but the main idea stayed the same, that legal immigration paperwork should not be taken lightly and should be conducted by professionals. In recent years, USCIS has alerted the public to immigration scams, involving unaccredited individuals who took money to prepare someone's application for naturalization, who either took the money and ran, or did not know what they were doing and filled it out incorrectly, costing the applicant the money to pay the preparer and their application fee (USCIS, June 9, 2011). By training for employees of grant funded organizations, the naturalization services are likely to be more reputable and higher quality. On the other end of the spectrum, many immigration applications are not filled in professionally—the majority being filled in by unprofessional applicants themselves or their family members. Nevertheless, the data constructs a lack of professional services as a problem in the data and argues that by becoming more professional, immigrants will benefit.

Under the topic of professionalism, there is one more point to consider and it involves the organizational missions which were presented in the subsection on the law. As previously

outlined, the mission of DHS is not outlined in every iteration of the CGP. Although it seems straightforward to connect policy to their overarching missions, in fact, with DHS and the CGP, the connection is complicated. In President Bush's 2002 proposal to create DHS, it is stated that DHS would have several "Non-Homeland Security Functions" (p. 5). In other words, portions of DHS would "not [be] directly related to securing the homeland against terrorism" (p. 5)— One of these named functions was naturalization (p. 5). So, while it is important to remember that the CGP is a program under DHS, early effort was made to set it apart from its mission. However, it has been in the enactment of DHS's Performance Management Framework (Homeland Security, n.d.), which scores programs under DHS based on their performance hitting targets to DHS's mission, that national security goals come to weigh on the CGP. So, while the mission is not put in every iteration of the CGP, when the mission is put in it is presented in connection to some sort of systematic performance review. Thus, it is in the process of professionalization that naturalization does become a Homeland Security Function, despite what was initially stated as intended in 2002. Through professionalism, the CGP becomes highly monitored and monitoring— highly controlled and controlling.

In this subsection, the reader has been alerted to the problems of inactivity (lack of citizenship), unfitness (inability to adapt), lawlessness (threats to the law and lawful) and disorder (lack of professionalism) which have been constructed in the data throughout its iterations. Moreover, the examples in this subsection solidify that the problems which are constructed in the CGP are not only placed with immigrants, but with organizations and the people who lead them. In this manner, all residents of the US are at risk for problematic behavior, whether they have national status or not. In summary, one can see that the four key problems are not mutually exclusive. They are entangled with one another in a large and complex web. In fact, in examining these issues and how they are constructed, I argue that they all build to an overarching problem— a problem with social cohesion. By fixing problems with citizenship, adaptation, the law and professionalism, the US intends to become a culturally cohesive and nationally secure state.

5.2 The Rhetorical Situation: Audience

Now that exigence has been unpacked, the latter half of the rhetorical situation will be discussed—the audience. In this subsection, I will briefly describe who the texts are being targeted to, and, in more detail, how the audience is constructed by the texts.

As explained in the data section, the main policy texts of the CGP are FOAs—documents that announce available funds. So, while the CGP as a policy is directed towards immigrants, the FOA itself is targeted towards organizations who can put the policy into action. In the data, these are called Community-Based Organizations (CBOs). In 2009, CBOs are defined in the following manner:

a public or private non-profit organization which is representative of a community or significant segments of a community and which provides educational or related services to individuals in the community. Such entities include but are not limited to: educational, community, and faith-based organizations; adult education organizations; libraries; volunteer and literacy organizations; etc. (CGP2009, p. 2).

From its start, the CGP has aimed to recruit expert CBOs who "[have] demonstrated experience in providing citizenship and/or immigration-related services to legal immigrants" (CGP2009, p. 2). Yet, as has already been illustrated, many iterations of the CGP seek to recruit potential professionals, calling for expansion and granting money to new organizations who could build capacity and learn to meet high standards. Certainly, recruitment is an integral part of the CGP. This can be seen in the secondary data as well with USCIS's semi-regularly updated document, *Expanding ESL, Civics, and Citizenship Education in Your Community* (USCIS, August 2017). The CGP and its surrounding documents make it clear that funding is intended for organizations that are already conducting citizenship classes or are interested in starting. At once, the CGP seeks actions from expert CBOs while also seeking to activate community members and potential organizers.

In the data, I find that the state is casting a wide net, aiming to deputize 'upstanding' or 'model citizens' as immigrant trainers and community leaders. In this way, the policy is constructing the audience as invested partners who share responsibility in making the CGP a success. This sense of shared responsibility is further validated by the secondary data, as it is found in many documents surrounding the strategy of DHS. DHS's strategic plan for fiscal years 2008-2013 (Homeland Security, 2008) says the following:

The Department of Homeland Security has a critical role in securing our Homeland, yet the nature of American society and the structure of American governance make it difficult to achieve the goals of a

secure homeland through the Department of Homeland Security alone [...] The Department's approach to homeland security requires shared responsibility and partnership with Congress; other Federal agencies, State, local, and tribal governments; the private sector; the American people; and our international partners. We need others to assist us to meet our goals in securing the Nation. (pp. 27-28)

Thus, while the explicit mission of DHS is brought to the fold only with performance reviews, the rhetoric of CGP consistently mirrors DHS. In this way, the audience is constructed as extensions of the departments under which the CGP operates, the human power needed to live out its principles and carry out its goals.

That the CGP constructs shared responsibility is not surprising as it is reliant on citizens to carry it out and is also reliant on voting citizens to ensure its continuation. As a piece of US policy it is ultimately speaking to the general voting public of US citizens, because it needs to advocate for its existence. This is similar to Winton's (2013) findings from the policy texts in their study. In the case of the CGP, the policy texts attempt to justify the use of tax dollars for this program which does not directly benefit current US citizens. Although USCIS is mostly funded by immigrants themselves through their green card and application fees (USCIS, May 28, 2021), the CGP's budget comes from the annual appropriations bill (DHS;USCIS, 2021). In this respect, the audience of the CGP is constructed as welcoming, humane, and— to some degree selfless— allowing their tax dollars to assist non-citizen immigrants, the 'deserving' ones at least.

Throughout the lifespan of the CGP, the conception of the audience stays relatively consistent, meaning, each administration more or less agrees on who the documents are targeted to—the community of US citizens— and who the program is targeted to —lawful immigrants. Although from year to year, there is some variation, each iteration of the CGP constructs the audience as a cultural unit, agreeing on the components of desired citizenship and the components needed to cultivate it among immigrants. In addition, the data constructs the audience as sharing the same specific principles and traits. Throughout all years of the CGP, the audience is considered compassionate yet sensible and always patriotic— compassionate enough to assist the lawful, but not so compassionate that they would risk their, and their fellow citizens', safety. The audience is constructed to share the belief that if immigrants are 'willing' and 'able' and 'moral', they should be accepted into the fold of the 'American family'.

In result, the CGP constructs an audience that is unified and cohesive in their understanding of one another. In other words, the CGP constructs the audience as a nation, aligning with Anderson's (2006) definition of it. This claim is further evidenced by the fact the audience is referred to as such. Despite being a state ordered program and a state-endorsed document, the word nation— sometimes even capital-N "Nation"— is used over state (For example, in CAGP2018RA, p.2). This links back to Flint (2006)'s assessment of terms in policy. It certainly seems that the almost exclusive use of the word nation rather than state is meant to build a sense of national connectedness. Thus it operates as a nation-building tactic. That the audience is desired to be a cohesive nation is also shown through the constructed problems— all which are behaviors or people that are considered to might threaten national cohesion.

In the data, the audience is not only constructed as a cohesive nation, but as a homogenous one. Along with evidence within the data (like the homogenizing requirements for citizenship preparation), evidence can also be derived from what is left out. Despite many years under the banner of integration, multiculturalism is absent from the primary data. When searching for acknowledgement of the culture immigrants possess and enact prior to coming to the US or prior to enrollment in the CGP— multiculturalism beyond the simple use of the term 'integration' cannot be found.

5.3 Persuasive Genres

Having outlined the rhetorical situation, I will now move to the persuasive genres, investigating how they are presented and how they show up in the data. In my analysis, I found the future-facing deliberative genre to be the most obvious persuasive genre of the data set. As mentioned previously, policy exists around a certain level of precarity as it is liable to change based on which party is running the US (Democratic or Republican) and their political leanings (Assimilation or Integration). Yet, since the CGP does share bipartisan support, the grant program seems to be precarious based on its yearly review for funding. So, it is fitting that the texts are at one moment asserting the program in its present form (molding future citizens), while also recruiting the people who will implement it (future professionals), and moreover, advocating for its future continuation (among the current and future body of citizens).

Although the deliberative genre is mostly found, the text does display subtle elements of the epideictic or ceremonial genre. On one hand, there is an ongoing celebration of immigrants who are deemed to be a good cultural fit — willing to work hard for citizenship. On the other hand, it could be argued that there is a subtle underlying blame of certain immigrants for the social deterioration of social cohesion. Although there seems to be a linkage of certain immigrants as incompatible with US values and culture, blame is not explicit. More explicit praise can be found in secondary data surrounding the CGP, especially on USCIS's website under a section about *Success Stories from Grant Recipients* (USCIS, February 17, 2021). In addition, the website gives praise to USCIS for the amount of money it puts forth every year to the CGP. It also celebrates the success of the programs in enrolling and assisting high numbers of 'lawful' immigrants.

Elements of the forensic genre are not readily apparent in the documents. As will be discussed in subsections to come, there seems to be no explicit argument about 'true accounts of past events' but an underlying assumption that everyone agrees on the history of the US and of the need for national security measures. Again, secondary data, like *A Guide to Naturalization* (USCIS, July 6, 2020) or the civics curricula (USCIS, June 2017) may reveal more elements of this genre, as it contains what USCIS has determined to be the most important information for naturalization applicants to know.

5.4 Canons of Invention: Ethos, Pathos, Logos

In this subsection, the data is further examined in regard to the rhetorical canons of invention, which includes an examination of ethos, pathos, and logos. The reader may notice that the canons have already been present in many of the previously presented excerpts. Taking this into consideration, the following subsections will attempt to avoid repetition, highlighting new examples and providing extended interpretation.

Ethos is the most prominent canon of invention that I found in the data. Appealing to the ethics of the reader, the CGP seems to attempt to gain trust based on established credibility and authority. The main speaker of the documents is the Office of Citizenship (OoC). Yet, the OoC speaks as a representative of its overarching bodies— first USCIS, and then, ultimately, DHS. That DHS is the ultimate authority is made evident throughout the documents— identified immediately upon looking at the texts. Each document places DHS as the heading, and until 2012, they bear its official seal:



**Department of Homeland Security (DHS)
Funding Opportunity Announcement (FOA):
FY 2012 Citizenship and Integration Direct Services Grant Program**

CIGP2012, p. 1

That DHS is the ultimate authority is also evidenced by the organizational hierarchy, given several times near the beginning of each document. For example, in 2015 the hierarchy was given twice:

Notice of Funding Opportunity (NOFO) Description

Issued By

U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), Office of Citizenship (CIGP2015, p. 1).

Program Overview, Objectives, and Priorities

The Office of Citizenship (OoC), within U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS), is charged with promoting instruction and training on the rights and responsibilities of citizenship. (CIGP2015, p. 2).

Unlike the OoC and DHS, USCIS is constructed as a lurking bureaucratic entity. Although USCIS is present in the data, it becomes clear that it is not the desired face of the CGP but the practical facilitator—the publisher for many of the secondary sources which are linked in the data, and the office of the grant contacts whose information is presented in the data. In this way, the OoC acts the face of the CGP, USCIS as the facilitator, and DHS as the director. The OoC uses its connection to DHS to bolster its own credibility. The status of DHS as an Executive Department of the US Government, the protector of the 'Homeland', and the enforcer of national security situates the OoC as strong and powerful as well. In the data, the OoC situates itself as an extension of DHS, putting the US and its citizens' safety first and sharing the responsibility to minimize threats.

It could be that the assumed credibility of DHS and its operations is the reason why logos is absent from the documents. In fact, there are no statistics, graphs, nor any other data-driven arguments that are used to justify the need for the CGP in the primary data. It also seems to be assumed that the need for the program is self-evident, therefore, texts do not need to explicitly appeal to logic. Although logos is absent from the documents themselves, the

logical appeal for the program does subtly exist in other sources surrounding the grant program. For instance, USCIS has issued a fact sheet after each round of program completion. In some years the fact sheet only includes descriptions about the organizations that received funding along with the amount that they received—for example in 2011 (USCIS, September 21, 2011). In other years—such as 2015 (USCIS, 2015) there is a comprehensive breakdown of participant demographics and outcomes, which could be used as logical justification for the program's success and continuation.

Pathos is not easily uncovered in primary data, which is not surprising as policy documents are typically seen as dry and emotionless. However, there are a few implicit appeals which might tug at the reader's emotions. As outlined in previous sections, all iterations of the CGP construct some concern towards certain immigrants (whether they be disadvantaged, or hardworking, etc). By highlighting these concerns, the data appeals to a reader's sense of compassion. In a similar manner, in constructing subproblems that connect to social cohesion, the data appeals to national pride, patriotism, and defensiveness. In many instances, these appeals go hand in hand. While the primary data has subtle emotional appeals, again, secondary data offers pathos more explicitly. Sections of the USCIS website, like *Outstanding Americans By Choice* (USCIS, 2021, November 1) and *Success Stories from Grant Recipients* (USCIS, February 17, 2021) contain more noticeably emotional rhetoric in order to promote and justify the continuation of the CGP by highlighting the stories of model immigrants and model immigrant-serving organizations.

5.5 Rhetorical Canons: Disposition and Delivery

When considering the canon of disposition in the CGP, many elements come into play. First, there is the arrangement of the program from year to year and there is also the arrangement of information on the page. In both instances, the arrangement alerts the audience to matters of priority (Kock & Villadsen, 2017). By sometimes splitting the CGP into two or three sub-programs, the speaker is showing the prioritised goals and objectives for a given year. In the same vein, by moving information to the top of the FOAs into the sections that give an overview of the program and its contents, it tips off the audience to the areas of emphasis and priority. The data seems to be constructed in a manner that considers the audience's attention span, putting the main arguments of the CGP first, then moving on to practical information.

Another element in the canon of disposition is the arrangement of words. If applying the same logic as the arrangement of the program and arrangement of words on the page, then the audience would be alerted to priorities based on setting certain words apart, and by looking at which words are first. For example, in iterations of the CGP which required both a citizenship and naturalization component, there was text that was formatted similar to this:

Proposed citizenship preparation activities **must** include the following two components:

1. **Citizenship instruction** to prepare lawful permanent residents for the civics (U.S. history and government) and English (reading, writing, and speaking) components of the naturalization test.
2. **Naturalization application services**, within the scope of the authorized practice of immigration law, to support lawful permanent residents in the naturalization application and interview process. (CIGP2012, p. 4, original bolding)

When considering arrangement, I argue that the formatting of "Citizenship instruction" and "Naturalization application services" aids the understanding that they are separate and that they are priorities. Yet, it is less clear whether putting citizenship first (even numbering as 1) indicates it is more important. When looking at it and the text surrounding it, I see that both numbered bullets are required. It is clear that the order of a few words can be indicative of priority but they must be considered in a broader context— situated within sentences, paragraphs, documents, programs, and so on. Certainly, the excerpt above is an interesting example because a key finding of the analysis is that citizenship is considered more important than naturalization. However, the finding was not based on word order. Word order did not result in any findings on their own and did not provide sole evidence for priority.

Another illustrative example about word order and its meaning comes from 'rights' and 'responsibilities'. While examining the data I do find instances of the words together in the same sentence. When this happens, rights always come first and responsibilities come second. Yet, the rhetoric surrounding the data did not show a priority for rights at all. In fact— as highlighted in the section on exigence— rights are minimally acknowledged and easily removed from the text of the CGP. When analyzing the data in full and placing it in the greater context of public discourse in the US, it seems that rights and responsibilities have morphed into its own singular phrase, in which only the boldest of speakers dare to separate. Therefore the word order that places rights before responsibilities does not in fact denote priority. Thus, although looking at individual words and their order did not produce conclusive findings on their own, it is not a useless task. Exploring word arrangement did

provoke deep examination, solidifying some findings, questioning others, and adding complexity and nuance to the study overall.

Just as with arrangement, elements of delivery provided emphasis to the arguments in the data, alerting the audience to key information through tactics like bolding, italics, and repetition. Certainly delivery alerted me to information which argued for a key problem or showed key changes. For example, it was nearly impossible to ignore the repetition of the words like lawful or assimilation, which in some years were present in almost every sentence of persuasive paragraphs. Yet, not all emphasized text was linked to problems. Where there was emphasis for words and phrases like "*Priority Immigrant Groups*" , **Must** and **May** and "**Lawful permanent residents only**", there were also phrases like "**Application Due Date: April 1, 2011**" (CIGP2011, p. 5). Again, much like disposition, delivery was not evidence in itself, but one component that when examined in a larger context could be used to build evidence.

5.6 Rhetorical Canons: Style

The style of grant documents is typically very technical— like an instruction manual for the application and the requirements of the program. In this sense, the data tends to match the typical style of its genre. In 2012, the CGP even contains checkboxes:

Type of Funding Instrument
Select the applicable funding instrument: <input checked="" type="checkbox"/> Grant <input type="checkbox"/> Cooperative Agreement
Cost Share or Match
Select the applicable requirement: <input type="checkbox"/> Cost Match <input type="checkbox"/> Cost Share <input checked="" type="checkbox"/> None Required

(CIGP2012, p. 3)

Indeed, other FOAs found on grants.gov follow the same format and do resemble checklists or instruction manuals. It then makes sense that in offering a step by step guide, straight-forward or technical language is used. For the most part the data portrays an objective style (See Leach, 2020, p. 9) presenting information giving the information as facts instead of matters for debate. Yet, it is quite jarring when statements are given in an objective style while they present topics that are widely contested or debated. For example, in 2014 the text says, "USCIS recognizes that naturalization is an important milestone in the civic integration of immigrants" (CIGP2014, p. 4). Then in 2018, the same sentence changes to "USCIS recognizes that naturalization is an important milestone in the civic assimilation of

immigrants" (CAGP2018, p. 2). Another change comes boldly in 2019: "USCIS recognizes that naturalization is the most important milestone in the civic assimilation of immigrants" (CAGP2019, p. 2). Lastly, in 2021 there is another alteration: "USCIS recognizes that naturalization is the most important milestone in the civic integration of immigrants" (CIGP2021, p. 1). With this example one sees that the same sentence is changed over the years, presenting different words and statements with very different connotations. Yet, in each text, the sentences are presented in an objective manner, reported as uncontested fact which needs no logical justification. This is reminiscent of the "political judgement masqueraded as pseudoscientific objectivity" that García Hernández (2021, p. 115) talks about.

Another example of the objective style comes from the data's avoidance of the first and second person—I/We/Us and You/They/Them. In the data, these are rarely used—absent in 2009, 2010, 2013, and sparse in later years. Although the texts mostly avoid the first and second person, a subtle, underlying 'us' and 'them' seems to be at play, as if the groups are being constructed from a distance, by an all-knowing and impartial party. When the first person is used it is in the form of the possessive, such as "enforce and administer our immigration laws" (CIGP2016, p. 3) "strengthens our communities and nation as a whole" (CIGP2011, p. 4) and "our shared American history" (CAGP2017, p. 4).

Another stylistic element that comes up in the text is the use of metaphor. One example was already provided above with the use of milestone, a figure of speech referring to someone overcoming an obstacle or completing a portion of a long journey. Other examples of metaphors found in the data mostly fall into one overarching category. These are what Winton (2013) calls "construction metaphors" (p. 162)—metaphors that talk about physically building something, but symbolizing the more cognitive development of skills, aptitude or morality. For example, a construction metaphor is present in this excerpt from 2014:

Naturalization requirements, such as knowledge of English and of U.S. history and civics, encourage civic learning and build a strong foundation upon which immigrants can exercise their rights and responsibilities. Through preparing for naturalization, immigrants will gain the tools to become successful citizens—ready to exercise their rights and meet their responsibilities as United States citizens. (CIGP2014, p. 4)

Here, the cultivation of citizenship is illustrated as an ongoing construction project, which will take hard work, but will pay off. The text asserts that by going through the naturalization process immigrants will fill their toolbelt, ensuring they have the essential knowledge and skills to not only attain citizenship but keep it active. The excerpt above is not a one-off. It is

an extended metaphor because it works across multiple sentences. In addition, it is used to some degree throughout all iterations of the CGP, showing its subtle but pervasive presence. While metaphors often go unnoticed and are taken for granted, they generate images that garner emotional responses often with the intent of eliciting specific actions. Therefore, a metaphor is not meaningless flourish but a persuasive tool to generate particular meanings. In this case, the construction metaphor seems to generate images of hard manual labor, promoting a strong, 'American' (Protestant), work ethic.

Although there are many metaphors that are subtly engaged in the data, one more will be examined in this subsection. The following excerpt comes from 2019 in a paragraph that directly follows one using a construction metaphors:

The goal of the Citizenship and Assimilation Grant Program is to expand the availability of high quality citizenship preparation services for lawful permanent residents across the nation and to provide opportunities for lawful permanent residents to gain the knowledge and training necessary to assimilate into the fabric of American society. (CAGP2019, p. 2, underline added)

In this excerpt, the American society is depicted as strong and collective, strung together by threads of citizens. Immigrants are seen as falling outside that fabric, yet if they learn certain knowledge and gain certain training, they can prove themselves assimilable and one day, be part of American society too. In 2021, the same metaphor is used, but simply swaps the word assimilate for "integrate" (CIGP2021, p. 2).

5.7 Rhetorical Canons: Memory

Although all aspects of rhetorical analysis are a matter of interpretation, the canon of memory is particularly hard to pin down and particularly difficult to unpack. In the data, there is no mention of collective memory, but there is much emphasis on a cohesive nation, which by the definition understood in this study, includes a shared cultural consciousness. Indeed, the data implies that the nation shares many things, including a core component of memory—history. Beginning in 2017, this was made explicit as it was made a priority under the newly introduced 'civic assimilation learning activities'. The text says:

Activities that promote in-depth understanding of the student's role as a future citizen of the United States, including the rights and responsibilities of citizenship; our shared American history; government functions, structure and laws; geography; and traditions, symbols and holidays. These can be external or in-class. (CAGP2017, p. 4)

This excerpt refers to a collective history which is known and accepted by citizens without debate. Group boundaries are clearly delineated, constructing the audience as insiders and program participants as potential insiders who need to learn the shared history before they can be included in it. Here, collective history is connected with shared responsibility. Although it is explicitly said that a shared history exists, there is no mention of its exact components—they are mainly present in the state-designed curriculum for citizenship classes, for example the sample curriculum (USCIS, June 2017) which is linked in the 2021 FOA. This is unlike shared responsibility, which is expanded upon in each CGP at length. Therefore, considering the connection between the two, I looked within what is said about shared responsibility in the data to gain insight into collective history.

Over the course of the analysis, I find that the key problems and responsibilities all circle back to cohesion and the protection of it from national threats. Thus, a key component of shared history is tied to DHS. Although the terrorist attacks of 9/11 are never mentioned in the primary data, the connection of all DHS's operations—including those of USCIS—are made clear in secondary data that surrounds the CGP. For example, on the USCIS website, in a subsection about their history is dedication to *Post-9/11* (USCIS, December 4, 2019) operations and how CGP, ICE and USCIS all continue their cooperation. Indeed, I argue that the cultural memory of 9/11 is present in the primary data—subtle as it may be—persuading the audience that the suspicion and surveillance of certain immigrants is justified, that DHS's operations are for the benefit of security, and citizenship cultivation is necessary in order for the US to exist as a cohesive, even peaceful, society. I find that the memory of 9/11 seems to loom large over the CGP, subtly but powerfully constructing certain immigrants—especially those who do not speak English and who are perceived as non-white—as security threats.

5.8 Summary of Results

Over the course of the analysis I find several persuasive subarguments in the CGP, arguing for the promotion of citizenship, adaptation, lawfulness and professionalism. They change slightly, depending on the year and the context surrounding the administration. Yet, all arguments lead back to an overarching concern for social cohesion and national security, revealing that the CGP seeks to construct a more stable, unified, and culturally homogenous nation. Moreover, the arguments of CGP are constructed differently over time and space. Within the shifting language, citizens are consistently categorized based on the degree of their

deservingness and whether or not— within the requirements of that particular year— they are deemed culturally fit. In this way, in the CGP, the boundaries between national insider and outsider are contested. Yet, they are contested within the overarching power structures of the state and constantly subject to the state-led borderscaping.

The analysis provides evidence that the state constructs citizens through the CGP by leading potential model citizens through a performance of responsible citizenship. The time spent in the program is likened to Garcés-Masareñas (2012)'s conception of probationary citizenship where applicants are put through a trial period of training and close monitoring. Whereas Harper (2017) identifies the naturalization process as gatekeeping mechanisms and the naturalization ceremony as the conversion point, the CGP exists in-between. During this probationary period, applicants are monitored for signs of their ability to be changed from the inside out, shepherding 'worthy' immigrants through the cultural gates and preparing them to prove themselves not only at the naturalization ceremony like Damsholt (2009) describes, but for the rest of their lives as US citizens. In result the CGP casts immigrants into vessels for state borderscaping— trained to do, be, and praise the border in the ways in which the state desires and expects.

Thus, I find that US national identity is inclusive and exclusive at the same time— open to all but only those who are willing to act in a manner that fits the state sanctioned responsibilities of citizenship. This aligns with the assimilation contract which Salins describes back in 1997. Although Salins (1997) is considered to be far to the right of the US political spectrum and although he was concerned that support for multiculturalism was diminishing the power of this type assimilation, the contract rings true for the CGP in all its years of operation, even subtly in the first. Despite integrationist language in years when a Democrat is president, the contract certainly seems to stay consistently intact— solidified through professionalism with each year of the CGP.

In theory, everybody is authorized to claim US national identity. In fact, it seems the enactment of citizenship is encouraged around the world (Kramer, 2018). The performance of 'Americanness' by way of speaking English, displaying the American flag, joining the US military, buying American products, spending time on US soil, etcetera, can all be considered measures of good moral character which in the 'right' combination and from the 'right' political administration could add up to eligibility for and acquisition of US citizenship. However, it might not. While the performance of American culture is widely encouraged,

there is no guarantee that a person who 'acts like a citizen' will gain state protection. Similar to Keskinen's findings about discursive boundary making (2012), I argue that the CGP—constructs discursive borders which place certain immigrants in contrast to state safety. In the case of the CGP, the borders are based upon unspoken cultural values that prioritize the safety of white, English speaking, Protestant people. While theoretically, everyone in the world could become eligible for US citizenship—practically speaking, the title and status is much more exclusive. In this respect, my analysis confirms previous critical literature. An immigrants' agency only goes so far when it comes to state protection. Coinciding with the most closely related literature on this topic, dichotomies surrounding migration are not sufficient to describe the complexity, dynamity, and messiness of immigrant experiences and they interact with the US naturalization process.

6 Discussion

Although in this study, I pay much attention to the power of the state, it should not be assumed that the US government as an institution is somehow static and unyielding to the influence of everyday people. While DHS is run by cabinet level officials, elected officials also impact the policies, and federal grants do receive feedback from their grantees and their participants. In fact, professionalism of education programs often includes some sort of system for program participants to share their feedback (USCIS, February 18). In this way, among others, organizational leaders and immigrants themselves do have a say in how the program moves forward, though much of the feedback comes from those organizations who are already accepted as grant recipients, therefore, they have already been approved—to some degree—as culturally fit, or culturally safe.

This topic of input and agency is important to flesh out more. In forming the literature review there were many calls not only for critical research, but research that looks into the experiences of immigrants who are taking part in the naturalization process. While this was not the focus of this study, I believe this is a good next step. It would be fruitful to look at the ways in which organizations and immigrants adhere to state sanctioned conceptions of citizenship and if they produce counter-performances. Having worked in a multilingual and multicultural organization myself, I expect there will be a dynamic web of reproduction, reconstruction and resistance to state-led boundaries. That being said, there would need to be much care surrounding ethics. In addition to ethics, the researcher should take care not to confuse participation with support. For example, in *Assimilation, American Style*, Salins (1997) argues that because many immigrants have adhered to the assimilation contract, it is therefore a successful system. He uses model citizens' success and the general level of societal complicitness of state-led cultural boundaries as justification that the contract works for the US. Yet, he does not consider the ways in which the line between voluntary and force may be blurry in this situation, and the ways in which the consent for this contract may be coerced. Thus, I think the concept of borderscaping is well-suited to continue into research surrounding the CGP that interacts with human participants.

Although studying human participants seems to be a fruitful place to continue the work presented here, this study has also paved the way for more research that examines rhetoric in grant funding documents. In many studies about political rhetoric there seems to be a large leap between the words and actions and vast questions about their connection. Yet with

grant documents, especially at the federal level, this leap is minimized as rhetoric surrounds very specific requirements that organizations must adhere to, otherwise they need to give back the money. FOAs or their equivalents, are uniquely positioned to study how rhetoric connects to reality, even more so than other types of policy texts, like higher level legislation or strategic plans where the consequences of living up to them might not be so clear cut.

In addition, the continued research of shared bipartisan interests under the naturalization process is highly important. Leach (2000) says, "from rhetorical analysis, it is not possible to generalize to other texts" (p. 12). Certainly, RA of the CGP in its next iteration is a crucial continuation. In the shift of administrations, from Trump to Biden, the 2021, Biden was quick to update certain aspects of the US naturalization process, including some portions of the CGP. However, as seen in the analysis, the majority of the changes were linguistic and did not alter the practical exclusions which the Trump administration had added over years. Therefore, it will be important to map what the Biden administration does with the CGP in the years to come. Considering the name of Exec. Order No. 14012, I am skeptical that alterations to the CGP would be that deep. In issuing the "Executive Order on Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans"— President Biden seems to appeal to skewed sense of nostalgia, just as Gest (from the news article by Lowe, July 17) attributed to President Trump. With continued protests against state sanctioned racism and violence which were not started but enflamed with the murder of George Floyd in June 2020, I wonder if the Biden administration is over-estimating Americans' past faith and their desire to restore policies and practices simply to the ways they were before Trump. Moreover, with calls to defund the police, to abolish the criminal justice system and the immigration system, I wonder if the Biden administration is also underestimating the power of US residents to perform citizenship in ways that counter the state's definition. Thus, it is fruitful to add on to this study, mapping changes in the CGP throughout the Biden administration, considering the ways in which social movements and political performances might shift the dynamics of borderscapes.

7 Conclusion

Winton (2013) has inspired a follow up question, which has acted as an extension to my initial research questions: What would happen if people accept and continue to accept the persuasive arguments presented in the CGP? This is a relevant question because, in fact, these arguments— even with slight shifts— have been accepted and granted funding each year. I contend that if arguments continue to be accepted and continue with their current trends, that the CGP will continue to churn out model citizens who accept and perform the assimilation contract. Furthermore, if the arguments continue to be accepted, the CGP will also continue to entrench the deeply rooted white supremacy at the base of the US naturalization process— not explicitly excluding immigrants based on race or ethnicity, but covertly doing so through cultural discrimination.

Leach (2000) argues that in providing a critique of persuasive arguments, the researcher produces a persuasive argument of their own. Certainly, in many ways I have used ethos and logos and many of the rhetorical canons in an attempt to justify my findings and validate my interpretations. In conclusion, I too attempt to appeal to the reader's emotions, not to lead them necessarily to a specific action but alert the reader to their capacity for action— highlighting their agency in borderscaping and their power in reifying or reconstructing the policies and practices of everyday realities.

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Appendix A

On the following pages the CGP2009 is attached in full.



Homeland Security

U.S. Citizenship and Immigration Services Office of Citizenship

Citizenship Grant Program

Funding Opportunity
DHS-09-CIS-010-001

OVERVIEW INFORMATION

General Information

Applicable Catalog of Federal Domestic Assistance (CFDA) Number:

97.010

Program Title:

Citizenship Grant Program

Synopsis of Program:

The Citizenship Grant Program being offered through the Office of Citizenship, within U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS), will provide monetary support to community-based organizations (CBOs) that serve immigrant populations. Approximately \$1.2 million of federal funding shall be made available through a competitive grant to CBOs that are located in areas of the United States with a large representation (or high concentration) of the nation's immigrant population.

The funds shall be used to support citizenship preparation programs incorporating activities to assist naturalization applicants (or potential naturalization applicants) to improve English language skills, gain knowledge of U.S. history and government (civics), prepare for the naturalization application and interview process, and expand awareness of available information and resources related to U.S. citizenship and the naturalization process. The funds may only be used to provide direct services to immigrants with legal status in the United States. Specific services to be provided may include but are not limited to, English as a Second Language (ESL), English Language (EL)/Civics, citizenship instruction, educational resources (textbooks, language software, computers, etc), assistance with preparing and completing the naturalization

application process (including case management), citizenship-focused community outreach, and staff and volunteer training.

Letter of Intent

If you intend to apply for Fiscal Year 2009 funding under this program, please send an email 30 days [April 15, 2009] prior to the application submission deadline to citizenshipgrantprogram@dhs.gov. Although submission of the notice of intent to apply is not mandatory, your email will help USCIS plan more efficiently for the review of applications. In your email, please include the name of your organization, address, contact person, and phone number.

DHS/USCIS Contacts:

Program Officer: Susan Anton, 202-272-1306, susan.anton@dhs.gov
Grants Officer: David Batcheller, 202-447-5272, david.batcheller@dhs.gov

Eligibility Information

Community-Based Organizations¹(CBOs) having demonstrated experience in providing citizenship and/ or immigration-related services to legal immigrants are eligible for funding under this program. CBOs are defined as a public or private non-profit organization which is representative of a community or significant segments of a community and which provides educational or related services to individuals in the community. Such entities include but are not limited to: educational, community, and faith- based organizations; adult education organizations; libraries; volunteer and literacy organizations; etc.

Award Information

- **Anticipated Type of Award:** Grant
- **Estimated Number of Awards:** Twelve
- **Anticipated Funding Amount:** Subject to the availability of funds. DHS estimates that \$1.2 million comprised of twelve \$100,000 grants will be available
- **Performance Period:** One year
- **Anticipated Award Date:** September 2009

Due Date

May 15, 2009

¹

See 20 U.S.C. § 7801

FULL PROGRAM DESCRIPTION

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I. FUNDING OPPORTUNITY DESCRIPTION

PROGRAM DESCRIPTION:

The mission of the Office of Citizenship (OoC), within U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS), is to foster immigrant integration and participation in American civic culture. The Office of Citizenship works to promote education and training on fundamental civic principles and the rights and responsibilities of citizenship.

The Office of Citizenship provides information and resources to immigrants at key points on their journey towards civic integration: when they first become permanent residents, as they apply for naturalization, and when they become new U.S. citizens.

The Office of Citizenship also develops educational resources, which include a variety of civics-based publications and training initiatives designed for immigrants, adult educators, and immigrant-serving organizations.

Request for Proposals:

The Office of Citizenship, through this funding opportunity, will provide monetary support to community-based organizations to support the mission of the Office of Citizenship. Approximately \$1.2 million in federal funding is available through this funding opportunity for community-based organizations interested in submitting proposals to build or expand citizenship preparation programs incorporating activities to assist naturalization applicants (or potential naturalization applicants) to improve English language skills, gain knowledge of U.S. history and government (civics), prepare for the naturalization application and interview process, and expand awareness of available information and resources related to U.S. citizenship and the naturalization process. The funds may only be used to provide direct services to immigrants with legal status in the United States. Specific services to be provided may include but are not limited to, ESL, EL/Civics, citizenship instruction, educational resources (textbooks, language software, computers, etc), assistance with preparing and completing the naturalization application process (including case management), citizenship-focused community outreach, and staff and volunteer training.

The Office of Citizenship invites eligible community-based organizations to submit project proposals that describe how they will build or expand existing citizenship preparation programs and resources for *priority immigrant groups*. The proposal must demonstrate how the organization will build or expand citizenship preparation programs incorporating activities to assist naturalization applicants (or potential naturalization applicants) to improve English language skills, gain knowledge of U.S. history and government (civics), prepare for the naturalization application and interview process, and expand awareness of available information and resources related to U.S. citizenship and the naturalization process.

For purposes of this funding opportunity, the Office of Citizenship invites eligible community-based organizations to submit proposals that will address how their program will serve one or more of the following *priority immigrant groups*:

- Legal Permanent Residents (LPRs) sixty-five years or older who are eligible, or soon to be eligible, to apply for naturalization;
- Refugees or asylees that have adjusted status to legal permanent resident (LPR) and are eligible, or soon to be eligible, to apply for naturalization (For a definition of “refugee” and “asylee” see Attachment C)
- Those persons that have adjusted to legal permanent resident (LPR) status under the Violence Against Women Act (VAWA), U or T Visa, or Special Immigrant Juvenile Visa Status and are eligible, or soon to be eligible, to apply for naturalization (For a description of VAWA and definitions of the U or T Visa and Special Immigrant Juvenile Visa Status, see Attachment C);
- Other disadvantaged groups as defined and justified by the proposing organization.

The required elements for the proposal and how to submit a proposal are identified under Section IV of this funding opportunity.

Supplantation/Maintenance of Effort

Requests for funds under this funding opportunity shall not be used to take the place of activities described in the application currently supported with other funding. Also, grant funds shall not be used to support activities that are a normal part of the organization’s operations.

II. AWARD INFORMATION

- A. **Type of Award:** Grant
- B. **Authority:** Public Law 110-329 (Consolidated Appropriations Act, 2009), Division D, Title IV
- C. **Estimated Number of Awards:** Twelve
- D. **Estimated Funding:** Subject to the availability of funds. DHS estimates that \$1.2 million in grant funding will be available. DHS anticipates awarding 12 grants for a maximum of \$100,000 (direct and indirect costs).
- E. **Performance Period:**
 - 1. The Performance Period will be for one year.

2. Extensions to the Performance Period may be awarded, but are not guaranteed and will not include increased funding.

III. ELIGIBILITY INFORMATION

A. Eligible Applicants

Community-based organizations (CBOs) having demonstrated experience in providing citizenship and or immigration-related services to legal immigrants are eligible for funding under this program. CBOs are defined as a public or private non-profit organization which is representative of a community or significant segments of a community and which provides educational or related services to individuals in the community. Such entities include but are not limited to: educational, community, and faith based organizations; adult education organizations; libraries; volunteer and literacy organizations; etc.

Documentation of non-profit and/or public status.

Documentation of non-profit or public status of the applicant institution must be included in the application. Applications that fail to meet eligibility criteria will be returned without review.

Any of the following constitutes acceptable proof of non-profit status:

- A reference to the applicant organization's listing in the Internal Revenue Service's (IRS) most recent list of tax-exempt organizations described in section 501(c)(3) of the IRS Code.
- A copy of a currently valid IRS tax exemption certificate.
- A statement from a State taxing body, State attorney general, or other appropriate State official certifying that the applicant organization has a non-profit status and that none of the net earnings accrue to any private shareholders or individuals.
- A certified copy of the organization's certificate of incorporation or similar document that clearly establishes non-profit status.
- Any of the items in the subparagraphs immediately above for a State or national parent organization and a statement signed by the parent organization that the applicant organization is a local non-profit affiliate.

The following constitutes acceptable proof of public status: A signed statement on official letterhead by an official authorized to apply for grant funds on behalf of the public entity shall suffice.

B. Cost Sharing

There is no cost share requirement for this program. However, projects that supplement government funding with in-kind contributions are encouraged. In addition, applicants may use their own funds to increase the capacity of the project. Applicants should clearly identify which budget items are to be supported by the Federal grant and which are to be supported by in-kind

contributions and/or other funding sources, together with an estimate of the value of these non-federal funding sources.

C. Non-Responsive Applications

Proposals with budgets exceeding the total award maximum of \$100,000 (direct and indirect costs) will not be considered for review. Proposals with budgets exceeding 30% for personnel (personnel and fringe benefits), or 20% for facility rental costs will not be considered for review. Proposals with project narratives exceeding 25 pages in length and which do not address the required items identified in Section IV.C.6. a-e will not be considered for review.

IV. APPLICATION AND SUBMISSION INFORMATION

Applicants must complete and include the following sections as part of their response to the solicitation. It is the responsibility of the applicant to ensure that the application is complete. The Office of Citizenship will remove the application from consideration prior to review if the application is incomplete.

A. Address to Request Application Package

Use the Grants.gov website to obtain application forms and instructions. Go to <http://www.grants.gov>, click “Apply for Grants,” and then click “Download a Grant Application Package and Instructions.” Enter the CFDA or the funding opportunity number (see the beginning of this announcement), and click the “Download Application Package” button. Click the “download” link for this opportunity and then follow the prompts to download the application package and the instructions package (if applicable).

B. How to Submit an Application

Applications must be submitted electronically through Grants.gov.

To submit an application through Grants.gov, applicants use Adobe Reader. **You must use a compatible version of Adobe Reader.** Adobe Reader is available from Grants.gov at no charge.

The applicant must have a DUNS number to submit an application through Grants.gov. See the Grants.gov website for information on how to obtain a DUNS number. In addition, the applicant must be registered with the Central Contractor Registry (CCR) to submit an application through Grants.gov. See the Grants.gov website for information on how to register with the CCR.

The applicant must be registered, credentialed and authorized at Grants.gov to submit an application through Grants.gov. See the Grants.gov website for information on how to register, obtain a credential and become authorized.

DHS strongly encourages applicants to obtain or update all registrations, credentials and authorizations related to Grants.gov well in advance of the deadline for submission (on May 15, 2009).

If the applicant encounters difficulties, please contact the Grants.gov Help Desk at 1-800-518-4726 to report the problem and obtain assistance with the system.

We may request that you provide original signatures on forms at a later date.

C. Content and Form of Application

You must complete the mandatory forms for this announcement, including the SF-424 (Application for Federal Assistance), SF-424A (Budget), and other forms in accordance with the application instructions on Grants.gov and additional instructions below. If submitting any information that is deemed proprietary, privileged or confidential commercial or financial information, please denote the beginning and ending of such information with asterisks (***)

MANDATORY FILES:

1. SF-424 – Application for Federal Assistance

Applicants must complete an SF-424 application form. This form may be completed while on the Grants.gov website or it can be completed offline in its entirety. NOTE: Applications submitted through Grants.gov must use the SF-424 provided by Grants.gov. The SF-424 application form can only be viewed and downloaded once Adobe Reader has been installed. The SF-424 application form on Grants.gov is formatted so applicants are only required to complete fields which are indicated with an asterisk (*) and color coded. Once the application is complete, close the document (you will then be prompted to save changes or not).

2. SF-424A Budget

Applicants must complete the budget in its entirety. Applicants must provide budgets by object class (salaries, fringe, travel, indirect, etc.). **Funds may be requested as long as the item and amount are necessary to perform the proposed work and are not precluded by the cost principles or program funding restrictions (see Section IV.F for Funding Restrictions).**

3. Budget Narrative (Justification) File(s)

- a. Attach your budget narrative and justification files (including separate budgets for each proposed subaward or subcontract) to the form named “Budget Narrative-V1.1” in the application package. If you need to add more documents than this form will allow (i.e. subaward budgets), please

use the optional “Other Attachments” form to attach the additional files (see below).

The guidance below is general in nature, be sure to refer to Section IV.F for Funding Restrictions applicable to this program.

b. Budget detail is required for:

i. PERSONNEL: Costs of employee salaries and wages.

Justification: Identify the project director or principal investigator, if known. For each staff person, provide the title, time commitment to the project (in months), time commitment to the project (as a percentage or full-time equivalent), annual salary, grant salary, wage rates, etc. Do not include the costs of consultants.

ii. FRINGE BENEFITS: Costs of employee fringe benefits unless treated as part of an approved indirect cost rate.

Justification: Provide the method used to calculate the proposed rate amount. If a fringe benefit has been negotiated with, or approved by, a Federal government cognizant agency, provide a copy of the agreement. If no rate agreement exists, provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement insurance, taxes, etc. Identify the base for allocating these fringe benefit expenses.

iii. TRAVEL: Costs of project-related travel by employees of the applicant organization (does not include costs of sub-contractor or consultant travel).

Justification: For each proposed trip, provide the purpose, number of travelers, travel origin and destination, number of days, and a breakdown of costs for airfare, lodging, meals, car rental, and incidentals. The basis for the airfare, lodging, meals, car rental, and incidentals must be provided, such as past trips, current quotations, Federal Travel Regulations, etc.

iv. EQUIPMENT: Any article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of (a) the capitalization level established by the organization for financial statement purposes, or (b) \$5,000. (Note: Acquisition cost means the net invoice unit price of an item of equipment, including the

cost of any modifications, attachments, accessories, calibration and maintenance services, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, protective in-transit insurance, freight, and installation shall be included in or excluded from acquisition cost in accordance with the organization's regular written accounting practices.)

Justification: For each type of equipment requested, provide a description of the equipment, the cost per unit, the number of units, the total cost, and a plan for use on the project, as well as use or disposal of the equipment after the project ends. An applicant organization that uses its own definition for equipment should provide a copy of its policy or section of its policy which includes the equipment definition.

- v. SUPPLIES: Costs of all tangible personal property other than that included under the equipment category.

Justification: Specify general categories of supplies and their costs. Show computations and provide other information which supports the amount requested.

- vi. CONTRACTUAL: Costs of all contracts for services and goods except for those that belong under other categories such as equipment, supplies, construction, etc. Include third party evaluation contracts (if applicable) and contracts with secondary recipient organizations.

Justification: Demonstrate that all procurement transactions will be conducted in a manner to provide, to the maximum extent practical, open and free competition. Identify proposed subaward/sub-contractor work and the cost of each subaward/sub-contractor. Provide a detailed budget for each subawardee that is expected to perform work estimated to be \$25,000 or more, or 50% of the total work effort, whichever is less. **The subawardee budget(s) should provide the same level of detail as that of the applicant (i.e., by Object Class Category/Cost Classification).** In addition, the following information must be provided:

Subcontracts - Identify each planned subcontractor and its total proposed budget. Each subcontractor's budget and supporting detail should be included as part of the applicant's budget narrative. In addition, the applicant shall provide the following information for each planned subcontract: a brief description of the work to be

subcontracted; the number of quotes solicited and received, if applicable; the cost or price analysis performed by the applicant; names and addresses of the subcontractors tentatively selected and the basis for their selection; e.g., unique capabilities (for sole source subcontracts), low bidder, delivery schedule, technical competence; type of contract and estimated cost and fee or profit; and, affiliation with the applicant, if any.

Recipient may be required to make pre-award review and procurement documents available to DHS, including request for proposals or invitations for bids, independent cost estimates, etc. This may include procurements expected to exceed the simplified acquisition threshold fixed at 41 USC 403(11) (currently set at \$100,000) and expected to be awarded without competition or only one bid or offer is received in response to a solicitation.

Subawardees – Identify each planned subawardee and its total proposed budget. Each subawardee's budget and supporting detail should be separate from the applicant's budget narrative.

All required flow down provisions in the award must be included in any subcontract or subaward.

- vii. **OTHER DIRECT COSTS:** Any other items proposed as direct costs. Provide an itemized list with costs, and state the basis for each proposed item.
- viii. **INDIRECT COSTS:** Provide a copy of the latest rate agreement negotiated with a cognizant Federal agency. If the applicant organization is in the process of initially developing or renegotiating a rate, upon notification that an award will be made, it should immediately develop a tentative indirect cost rate proposal based on its most recently completed fiscal year, in accordance with the cognizant agency's guidelines for establishing indirect cost rates, and submit it to the cognizant agency. Applicants awaiting approval of their indirect cost proposals may also request indirect costs. When an indirect cost rate is requested, those costs included in the indirect cost pool should not also be charged as direct costs to the award. Also, if the applicant is requesting a rate which is less than what is allowed under the program, the authorized representative of the applicant organization must submit a signed acknowledgement that the applicant is accepting a lower rate than allowed.

4. **Certifications/Assurances**

- a. Applicants must submit:
 - i. SF-424B – Assurances – Non-construction Programs; and
 - ii. Certification Regarding Lobbying. If paragraph two of the certification applies, then complete and submit the SF-LLL Disclosure of Lobbying which is provided as an optional form in the application package.
- b. By signing and submitting an application under this announcement, the applicant is providing: Certification Regarding Debarment, Suspension, and Other Responsibility Matters – Primary Covered Transactions (see Attachment A); and Certification Regarding Drug-Free Workplace Requirements (see Attachment B).

5. **Project Abstract/Summary (no more than one page)**

Provide a summary description, not to exceed one page, suitable for dissemination to the public. It should be clear and concise. This Abstract must not include any proprietary/confidential information. The Abstract must identify the following using the headers (in bold) provided below:

- **Organization Legal Name:**
- **Organization Legal Address** (street, city/state):
- **Authorized Official** (name, title, address, phone number; and email address):
- **Point of Contact** for the Application (name, title, address, phone number; and email address):
- **Partner(s) Associated with the Project** (name of organization):
- **Total Federal Funding Requested:**
- **Priority Immigrant Group(s) to be served:**
- **Total Priority Immigrant Group within the Community/Communities to be served** by the project:
- **Goal(s) and Objectives** (Listed and clearly defined)

Attach the Project Abstract/Summary to the “Project Abstract-V1.1”
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6. **Project Narrative (total of 25 pages)**

This section provides a comprehensive framework and description of all aspects of the proposed program. It should be succinct, self-explanatory and well organized so that reviewers can understand the proposed project.

The following paragraphs describe the elements that must be included in the Project Narrative portion of your application. An application that does not

include each required element listed in this section using the headers provided (items a-e) and/or is in excess of 25 pages will be deemed non-responsive and will not be considered.

- For duplication and scanning purposes, please ensure that the application can be printed on 8 ½” x 11” single-sided paper.
- Font size must be at least 12 point, preferably Times New Roman font.
- Margins must be at least one (1) inch at the top, bottom, left and right of the paper.
- Pages should be numbered consecutively and are limited to a total of 25 pages.
- Attach the completed Project Narrative to the “Project V1.1” form.

a. INTRODUCTION AND PURPOSE/GOALS AND OBJECTIVES

Describe the purpose of the proposed project and the anticipated accomplishments (goals) and describe the measurable steps (objectives) to achieve the accomplishments. State clearly why the proposed project is expected to have a substantial positive impact on the appropriate goals and objectives.

b. NEEDS ASSESSMENT

This element of the application should outline the need for, and significance of, the project in the specific community or population. Relevant published and unpublished data and observational information with appropriate citations to support the need for and significance of the project should be included. While data may be included to illustrate and provide context of a national need, discussion of local need or assessment of need specific to the *priority immigrant group* must be included.

To support the needs assessment the applicant may include: the total population to be served by the project using reputable or substantiated statistical data or evidence such as state or local government reports, regional analyses, published policy reports or U.S. Census Bureau data, such as the American Community Survey; the demographic data for the overall immigrant population needing citizenship training/preparation services; and, identification and justification for the *priority immigrant group* to be supported by the project (include a description of the geographic location, size, ethnic group(s) or nationality(ies), etc.).

The applicant should describe:

- services provided for citizenship preparation and/or training;
- current or previous initiatives to address the needs of the *priority immigrant group* and whether or not these initiatives were effective; and,
- specific challenges or needs of the *priority immigrant group*.

This element is intended to help reviewers understand the need for, and challenges of, the specific proposed strategies within the context of the community in which the strategies will be implemented.

c. *PROGRAM AND PERFORMANCE PLAN*

This element of the application describes the specifics of the proposed project which should include the project design and a performance plan for implementation of the project. The project design and performance plan must describe the project strategy and discuss how the strategy will address the identified needs of the selected *priority immigrant group* and support the goals and objectives of the project. The project design should:

- Provide detailed information concerning how the project selected will provide or expand citizenship preparation services to the *priority immigrant group*. Include specific tasks and activities that would be necessary to accomplish each goal and objective identified in the previous section.
- Provide a detailed timeline and associated performance measures for the completion of the goals and objectives. The timeline should include each major activity and identify responsible staff. A graphic representation (e.g., Gantt or PERT chart) may be helpful in the review process.
- Include the curriculum/teaching plan, as well as a description of accompanying educational materials to be used. These should be included as an attachment to the application (these documents do not count toward the page limit for the Project Narrative).
- Identify barriers (e.g., barriers to attendance such as: transportation, childcare, student tuition, flexible class offerings, and alternate classroom sites, etc.) encountered by the *priority immigrant group* and describe solutions to resolve the barriers.
- Describe how you will conduct outreach to raise awareness of available services and recruit individuals in the *priority immigrant group*. Outreach may include efforts to raise awareness of available citizenship preparation programs incorporating activities to assist naturalization applicants (or potential naturalization applicants) to improve English language skills, gain knowledge of U.S. history and government (civics), prepare for the naturalization application and interview process, and expand awareness of available information and resources related to U.S. citizenship and the naturalization process.

d. CAPACITY BUILDING AND PROJECT MANAGEMENT PLAN

The applicant must provide a discussion of how they will use grant funds to build organizational capacity to provide and/or expand citizenship preparation services to the *priority immigrant group* in the area of citizenship preparation programs incorporating activities to assist naturalization applicants (or potential naturalization applicants) to improve English language skills, gain knowledge of U.S. history and government (civics), prepare for the naturalization application and interview process, and expand awareness of available information and resources related to U.S. citizenship and the naturalization process.

Information on both current and past projects related to these efforts should be included in the applicant organization's description. The project management plan should include: a summary of existing capabilities for programmatic and fiscal staff along with a description of roles and responsibilities; a detailed description of the project's staffing needs which may include staff and volunteer development and training, as well as hiring additional staff members to meet program goals and objectives; and, current use of volunteers (roles and responsibilities) and any plans for outreach, recruitment, and retention of volunteers. Résumés for the proposed key personnel or a position description for a key position (if not filled) should be limited to one page each and should be attached to the "Other Attachments" form of the application package. Résumés and position descriptions are not counted in the page limitation for the Project Narrative.

If other organizations (or consultants) are involved in the proposed project, clearly identify the name of the organization and the key individual(s), and briefly describe each organization(s) role and responsibilities. Include any relevant experience for the participating organization/individual. If other organizations will be involved, you must include a letter from the participating organization that describes the proposed working relationship between the applicant agency and the other organization. This letter should clearly describe their roles/responsibilities and indicate their commitment to the project/program (in-kind services, dollars, staff, space, equipment, etc.).

e. SUSTAINABILITY

Sustainability is an important aspect of this program. For this element of the application, the applicant should describe:

- how the organization plans to continue the services to the *priority immigrant group* beyond federal funding;

- how volunteers will be recruited, retained, and used on a long-term basis to sustain the project;
- involvement of local community participation and commitment to the project;
- how the organization will maintain and grow capacity and capability within its organization and with other community-based organizations on a long-term basis.

7. Other required attachments

Attach the following items to the “Other Attachments V1.1” form.
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- A list of other Federal Grant programs from which your organization currently receives funding or for which it has applied in the Federal Fiscal Year of 2009.
- Documentation of Non-profit and/or public status.
- Indirect Cost Rate Agreements.
- Negotiated Fringe Benefit Agreements or, if no agreements exist, the amounts and percentages of all items that comprise the fringe rate, and the basis for allocation, if separate from the Indirect Cost Rate Agreement.

D. Submission Dates and Times

Application Closing Date: May 15, 2009

E. Intergovernmental Review

This program is subject to Executive Order 12372, “Intergovernmental Review of Federal Programs.” When comments are submitted directly to DHS, they should be transmitted electronically to marilyn.morgan@dhs.gov (if unable to transmit electronically please contact the DHS Grants Office at (202) 447-5696 for alternative transmission instructions).

The official list, including addresses of the jurisdictions that have elected to participate in E.O. 12372 can be found on the following URL:

<http://www.whitehouse.gov/omb/grants/spoc.html>

F. Funding Restrictions

1. DHS grant or cooperative agreement funds may only be used for the purpose set forth in the agreement, and must be consistent with the statutory authority for the award. Grant funds may not be used for cost-sharing or matching funds for other Federal grants, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal government or any other government entity.
2. Funds shall only be used to provide services to immigrants with legal status in the United States.
3. Funds can only be used to provide direct services to immigrants. Specific services to be provided may include but are not limited to, English as a Second Language (ESL), English Language (EL)/Civics, citizenship instruction, educational resources (textbooks, language software, computers, etc), assistance with preparing and completing the naturalization application process (including case management), citizenship-focused community outreach, and staff and volunteer training.
4. Personnel costs are allowable but may not exceed more than 30% of the total approved budget.
5. Facility rental costs are allowable as long as the costs do not exceed more than 20% of the total approved budget.
6. Student transportation costs are allowable for participants attending set classes.
7. Childcare costs are allowable if incurred to assist eligible participants attend set classes.
8. The funds cannot be used for immigration/naturalization application fees.
9. Costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions, are unallowable.
10. Equipment purchases should be directly related to the provision of services (e.g., computers for classroom instruction).
 - Prior to the purchase of equipment in the amount of \$5,000 or more per unit cost, the Recipient must obtain the written approval from DHS.
 - The Recipient shall maintain an annual inventory which will include a brief description of the item, serial number and amount of purchase for equipment purchased with grant/cooperative agreement funds, or received under a grant or cooperative agreement, and having a \$5,000 or more per unit cost. The

inventory must also identify the subaward under which the equipment was purchased.

- Maintenance and insurance will be the responsibility of the Recipient.
 - Title of equipment will remain with the Recipient until closeout when disposition will be provided in writing by DHS within 120 days of submission of final reports.
11. Profit/Fee is not allowable except when subcontracting for routine goods and services with commercial organizations.
 12. Foreign travel is not allowable under this funding opportunity.
 13. Construction costs and purchase of real property are not allowable under this funding opportunity.
 14. Pre-award costs are not allowable under this funding opportunity.
 15. Funding for direct reimbursement of proposal development costs is not allowable.

V. REVIEW PROCESS AND SELECTION CRITERIA

A. Review Process

1. DHS conducts an initial review of applications to determine eligibility and completeness of the application. If an applicant is determined to be ineligible or an application is deemed incomplete/non-responsive then, DHS will notify the applicant. All eligible and complete/responsive applications will be competitively reviewed.
2. DHS will assemble subject matter experts from within the Federal Government to review the full proposals. Reviews of submitted proposals will be conducted either in person, by mail, or electronically.

At a minimum, 2 subject matter experts will review each proposal and provide summary comments and overall ratings based on the evaluation criteria below. Copies of all proposals are available for inspection by all of the members of the review panel upon request.

3. DHS's designated Selection Authority (SA) will make a final funding decision based upon the results of the evaluation, availability of funds, any funding priorities, and the overall goals of the Citizenship Grant Program.
4. **Confidentiality and Conflict of Interest.** Technical and cost proposals submitted under this funding opportunity will be protected from unauthorized disclosure in

accordance with applicable laws, and regulations. DHS may use one or more support contractors in the logistical processing of proposals. However, proposal selection and award decisions are solely the responsibility of DHS personnel.

DHS screens all panelists for potential conflicts of interest. To determine possible conflicts of interest, DHS requires potential reviewers to complete and sign conflicts of interest and nondisclosure forms. DHS will keep the names of submitting institutions and individuals, as well as the substance of the proposals confidential except to reviewers, and will destroy any unsuccessful proposals after one year following the funding decision.

5. DHS discourages, and will not consider, any materials submitted by or on behalf of the applicant other than those materials requested in this funding opportunity announcement.

B. Evaluation Criteria

DHS will use the following criteria to evaluate those submitted applications deemed eligible and complete.

1. Program Design (35 points)

- The extent to which the applicant is able to identify and describe a compelling need for citizenship preparation services in the community that it serves or plans to serve with focus on one or more of the *priority immigrant groups* through statistical data, including the size and complexity of the community's needs, as well as geographic location, total population, or other relevant demographic information as it relates to their respective community and the nation as a whole;
- The extent to which the applicant demonstrates current or previous efforts to address the specific citizenship-related challenges faced by the *priority immigrant group* that will be served and whether or not these approaches were effective;
- The extent to which the applicant proposes well designed program activities to address the need described;
- The extent to which project activities seem feasible and likely to succeed;
- The extent to which project activities and milestones can realistically be completed within the grant cycle;
- The extent to which the applicant is able to describe how the organization will effectively utilize volunteers (including VISTA and AmeriCorps) to address the compelling need identified among the *priority immigrant group*.
- The extent to which the applicant is able to discuss the adequacy of the program's budget to support its program design, including how it is sufficient to support your program activities and is linked to your desired outputs and outcomes.

2. **Past Performance (20 Points)**

- The extent to which the applicant is able to demonstrate the success of their past related programmatic activities.
- The extent to which the applicant already provides, or has experience providing, direct citizenship preparation services to *priority immigrant groups*;
- Whether the applicant's organization has a sound record of accomplishments as an organization, including an ability to (1) develop and support successful direct service programs; (2) develop and implement strategies to increase the organization's capacity; (3) demonstrate leadership within the community served.
- The extent to which the applicant has any past experience utilizing volunteers, including those members of a National Service Program

3. **Qualifications of Staff and or Organization (25 points)**

- The extent to which the applicant identifies and demonstrates that qualifications, capabilities, and educational background of the key personnel who will perform the programmatic activities are relevant and will contribute to the success of citizenship preparation program goals and objectives.
- The degree to which the organization has a sound structure including: (1) the ability to provide sound programmatic and fiscal oversight (2) well-defined roles for its board of directors, administrators, and staff; (3) a well-designed plan or system for organization (as to program) self-assessment and continuous improvement; and (4) the ability to provide technical assistance.

4. **Performance and Sustainability Outcomes (20 points)**

- The extent to which the applicant explains how the organization will continue the Citizenship Grant Program if it does not receive any future federal funding under this program.
- The extent to which the applicant's plan includes sound strategies for preserving the proposed project on a long-term basis, including effective utilization of volunteers.
- The extent to which the applicant is able to describe a plan to utilize award funds to leverage future funding.
- The extent to which the applicant is able to demonstrate that the organization has the capacity and the commitment to sustain the project on a long-term basis and is able to initiate and sustain continuing planning efforts
- The extent to which the applicant clearly defines performance standards and provides a plan to track and report performance.

C. **Selection Factors**

Proposals are usually awarded in the numerical order in which they are ranked. However, the DHS Source Selection official may consider the following program policy factors in making an award: (a) whether a proposal represents a diverse service population among the *priority immigrant population*; (b) whether a proposal represents a diverse geographic area; (c) whether a proposal does not substantially duplicate other proposals submitted in response to this announcement; and, (d) whether the proposal represents diverse community sizes (i.e. city, locality, or service area).

VI. AWARD ADMINISTRATION INFORMATION

A. Notice of Award

A grant will be executed by a DHS Grants Officer authorized to obligate DHS funding.

B. Administrative and National Policy Requirements

Awards under this announcement are subject to the following administrative and national policy requirements.

1. Administrative and Cost Principles. The following Administrative and Cost Principles, as applicable, apply to the award:

- a.** OMB Circular A-110, relocated to 2 CFR Part 215, “Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations”
- b.** 44 CFR Part 13, “Uniform administrative requirements for grants and cooperative agreements to State and local governments.”
- c.** OMB Circular A-87, Relocated to 2 CFR Part 225, “Cost Principles for State, Local, and Indian Tribal Governments”
- d.** OMB Circular A-21, relocated to 2 CFR Part 220. “Cost Principles for Educational Institutions.”
- e.** OMB Circular A-133, “Audits of States, Local Governments, and Non-Profit Organizations.”

These publications may be viewed at:

http://www.whitehouse.gov/omb/grants/grants_circulars.html

2. Nondiscrimination. The award is subject to the following terms:

- a.** TITLE VI OF THE CIVIL RIGHTS ACT OF 1964. As amended, provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject

to discrimination under any program or activity receiving Federal financial assistance. Title VI also extends protection to persons with limited English proficiency. (42 U.S.C. 2000d et seq.)

- b. TITLE IX OF THE EDUCATION AMENDMENTS OF 1972.** Provides that no person in the United States shall, on the basis of sex, be excluded from participation in, be denied benefits of, or be subject to discrimination under any education program or activity receiving Federal financial assistance. (20 U.S.C. 1681 et seq.)
 - c. THE AGE DISCRIMINATION ACT OF 1975.** Provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance. (42 U.S.C. 6101 et seq.)
 - d. SECTION 504 OF THE REHABILITATION ACT OF 1973.** Provides that no otherwise qualified individual with a disability in the United States, shall, solely by reason of his/her disability, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance. (29 U.S.C. 794)
 - e. THE AMERICANS WITH DISABILITIES ACT OF 1990 ("ADA").** Prohibits discrimination on the basis of disability in employment (Title I), state and local government services (Title II), places of public accommodation and commercial facilities (Title III). (42 U.S.C. 12101-12213)
- 3. Certifications and Assurances.** Certifications and assurances regarding the following apply:
 - a. LOBBYING.** Section 319 of Public Law 101-121 prohibits the use of funds in lobbying members and employees of Congress, as well as employees of Federal agencies, with respect to the award or amendment of any Federal grant, cooperative agreement, contract, or loan. DHS has codified restrictions upon lobbying at 6 CFR Part 9. (31 U.S.C. 1352)
 - b. DRUG-FREE WORKPLACE ACT.** Requires the recipient to publish a statement about its drug-free workplace program and give a copy of the statement to each employee (including consultants and temporary personnel) who will be involved in award-supported activities at any site where these activities will be carried out. Also, place(s) where work is being performed under the award (i.e., street address, city, state and zip code) must be maintained on file. The recipient must notify the Grants Officer of any employee convicted of a violation of a criminal drug statute that occurs in the workplace. (41 U.S.C. 701 et seq.)
 - c. DEBARMENT AND SUSPENSION.** Executive Orders (E.O.) 12549 and 12689 provide protection from fraud, waste, and abuse by debarring or suspending those

persons that deal in an irresponsible manner with the Federal government. The recipient must certify that they are not debarred or suspended from receiving Federal assistance.

- d. FEDERAL DEBT STATUS.** The recipient may not be delinquent in the repayment of any Federal debt. Examples of relevant debt include delinquent payroll or other taxes, audit disallowances, and benefit overpayments. (OMB Circular A-129)

4. Trafficking in Persons

- a. Provisions applicable to a Recipient that is a private entity.**
 - i. The Recipient, Recipient's employees, subrecipients under the Award, and subrecipients' employees may not—**
 - (A) Engage in severe forms of trafficking in persons during the period of time that the Award is in effect;
 - (B) Procure a commercial sex act during the period of time that the Award is in effect; or
 - (C) Use forced labor in the performance of the Award or subawards under the Award.
 - ii. DHS may unilaterally terminate the Award, without penalty, if the Recipient or a subrecipient that is a private entity—**
 - (A) Is determined to have violated a prohibition in paragraph a.i. of this section; or
 - (B) Has an employee who is determined by DHS to have violated a prohibition in paragraph a.i. of this section through conduct that is either—
 - (1) Associated with performance under the Award; or
 - (2) Imputed to the Recipient or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, "OMB Guidelines to Agencies on Government-wide Debarment and Suspension (Nonprocurement)."
- b. Provision applicable to a Recipient other than a private entity. DHS may unilaterally terminate the Award, without penalty, if a subrecipient that is a private entity—**

- i. Is determined to have violated an applicable prohibition in paragraph a.i. of the Award this section; or
 - ii. Has an employee who is determined by DHS to have violated an applicable prohibition in paragraph a.i of this section through conduct that is either—
 - (A) Associated with performance under the Award; or
 - (B) Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, “OMB Guidelines to Agencies on Government wide Debarment and Suspension (Nonprocurement).”
- c. Provisions applicable to any Recipient.
 - i. The Recipient and subrecipient must inform DHS immediately of any information the Recipient or subrecipient receives from any source alleging a violation of a prohibition in paragraph a.i. of this section.
 - ii. DHS’ right to terminate unilaterally that is described in paragraph a.ii or b of this section:
 - (A) Implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and
 - (B) Is in addition to all other remedies for noncompliance that are available to DHS under the Award.
 - iii. The Recipient must include the requirements of paragraph a.i of this section in any subaward the Recipient makes to a private entity.
- d. Definitions. For purposes of the Award:
 - i. “Employee” means either:
 - (A) An individual employed by the Recipient or a subrecipient who is engaged in the performance of the project or program under the Award; or
 - (B) Another person engaged in the performance of the project or program under the Award and not compensated by the Recipient including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.

- ii. “Forced labor” means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- iii. “Private entity:”
 - (A) Means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25.
 - (B) Includes:
 - (1) A non-profit organization, including any non-profit institution of higher education, hospital, or tribal organization other than one included in the definition of Indian tribe at 2 CFR 175.25(b).
 - (2) A for-profit organization.
- iv. “Severe forms of trafficking in persons,” “commercial sex act,” and “coercion” have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).

5. Information and Data Quality. Congress, through OMB, has instructed each Federal agency to implement Information Quality Guidelines designed to “provide policy and procedural guidance for ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by Federal agencies.” Information quality procedures may apply to data generated by grant or cooperative agreement recipients if those data are disseminated as described in the Guidelines. The Office of Management and Budget (OMB) Circular A-110 has been revised to provide public access to research data through the Freedom of Information Act (FOIA) under some circumstances. Data that is (1) first produced in a project that is supported in whole or in part with Federal funds and (2) cited publicly and officially by a Federal agency in support of an action that has the force and effect of law (i.e., a regulation) may be accessed through FOIA. If such data are requested by the public, DHS must ask for it, and the awardee must submit it, in accordance with A-110 and applicable regulations at 40 C.F.R. 30.36.

6. Acknowledgement of DHS Support. DHS’ full or partial support must be acknowledged in journal articles, oral or poster presentations, news releases, interviews with reporters and other communications. Any documents developed under an award under this announcement that are intended for distribution to the public or inclusion in a scientific, technical, or other journal shall include the following statement:

This publication [article] was developed under DHS Agreement No. _____ awarded by the U.S. Department of Homeland Security. The views and conclusions contained in this document are those of the authors and should not be interpreted as necessarily representing the official policies, either expressed or implied, of the U.S. Department of Homeland Security. The Department of Homeland Security does not endorse any products or commercial services mentioned in this publication.

- 7. Use of DHS Seal and Non-Endorsement.** Recipient shall acquire DHS' approval prior to using the DHS seal. DHS funding of projects under an award does not equate to DHS' endorsement of such projects.

C. Reporting Requirements

1. Financial Reports

- a. The Recipient shall submit quarterly financial reports (SF-269, Financial Status Report) to the DHS Grants Officer within 30 days after the end of each reporting period. Reports are due October 30, January 30, April 30, and July 30. Reports shall be submitted via email to DHS-GrantReports@dhs.gov (include the DHS grant number in the subject line of the email.).
- b. The Recipient is required to submit a quarterly Cash Transaction Report (SF 272) to the Department of Health and Human Services Division of Payment Management.
- c. The Recipient is required to submit a Final Financial Status Report (SF 269) to the DHS Grants Officer within 90 days after the expiration date of the Performance Period.

2. Performance Reports

- a. Quarterly Performance Reports. The Recipient shall submit quarterly performance reports to the DHS Grants Officer within 30 days after the end of each reporting period. Reports are due October 30, January 30, April 30, and July 30. Reports shall be submitted via email to DHS-GrantReports@dhs.gov (include the DHS grant number in the subject line of the email.).
- b. Performance Reports shall consist of a comparison of actual accomplishments to the approved project objectives, and provide information documenting the status of budgeted versus actual expenditures, in accordance with the project management plan. If not addressed in the comparison of actual accomplishments to the approved project objectives, the following information should also be included in the performance report:
 - the number of *priority immigrant group* individuals trained and assisted in the following activities: citizenship preparation programs to improve English

language skills, gain knowledge of U.S. history and government (civics), prepare for the naturalization application and interview process, and expand awareness of available information and resources related to U.S. citizenship and the naturalization process.

- any additional capacity offered to the *priority immigrant group*
 - any expanded capacity of services offered to the *priority immigrant group* (for example: *additional ESL training sessions offered*), and
 - a description of lessons learned with a discussion of what could have been done differently and the challenges encountered and addressed.
- c. The Final Performance Report shall be submitted to the DHS Grants Officer no later than 90 days after the expiration date of the Performance Period.

VII. DEPARTMENT OF HOMELAND SECURITY CONTACTS

A. Program Officer

Susan Anton
Office of Citizenship
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue, NW Room 5200
Washington, DC 20529-2010
Phone: 202-272-1306
E-mail: susan.anton@dhs.gov

B. Grants Officer

David Batcheller
Department of Homeland Security
Attn: Office of Procurement Operations/Grants and Financial Assistance
Division, Mail Stop 0115, Room 3051
245 Murray Lane, SW
Washington, DC 20528-0115
Phone: 202-447-5273
E-mail: david.batcheller@dhs.gov

VIII. OTHER INFORMATION

A. Copyright and Data Rights.

1. **Copyright:** The Recipient may publish, or otherwise exercise copyright in, any work first produced under this Agreement unless the work includes information that is otherwise controlled by the government (e.g. classified information or other information subject to national security or export control laws or regulations).For

scientific, technical, or other copyrighted work based on or containing data first produced under this Agreement, including those works published in academic, technical or professional journals, symposia proceedings, or similar works, the Recipient grants the government a royalty free, nonexclusive and irrevocable license to reproduce, display, distribute copies, perform, disseminate, or prepare derivative works, and to authorize others to do so, for government purposes in all such copyrighted works. The Recipient shall affix the applicable copyright notices of 17 U.S.C. 401 or 402, and an acknowledgment of government sponsorship (including award number) to any work first produced under this Agreement.

2. Data Rights:

General Requirements. The Recipient grants the Government a royalty free, nonexclusive and irrevocable license to reproduce, display, distribute copies, perform, disseminate, or prepare derivative works, and to authorize others to do so, for Government purposes in:

- a. Any data that is first produced under this Agreement and provided to the Government; or
- b. Any data owned by third parties that is incorporated in data provided to the Government under this Agreement.

“Data” means recorded information, regardless of form or the media on which it may be recorded.

Requirements for subawards. The Recipient agrees to include in any subaward made under this Agreement the requirements of the Copyright and Data Rights paragraphs of this article and of 37 C.F.R. 401.14.

B. Technology Transfer

Recipient agrees to work with the technology transfer component of recipient’s institution to engage in technology transfer and commercialization activities associated with recipient’s research using the funding received under an assistance agreement issued pursuant to this announcement.

Attachment A

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is required by the regulations implementing Sections 5151-5160 of the Drug-Free Workplace Act of 1988 (P.L. 100-690, Title V, Subtitle D; 41 U.S.C. 701 et seq.).

1. **By signing and/or submitting this application for a grant or cooperative agreement, the awardee is providing the certification set out below.**
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant or cooperative agreement. If it is later determined that the awardee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal government, may take action authorized under the Drug-Free Workplace Act.
3. For awardees other than individuals, Alternate I applies.
4. For awardees who are individuals, Alternate II applies.
5. Workplaces under grants or cooperative agreements, for awardees other than individuals, need not be identified on the certification. If known, they may be identified in the assistance agreement application. If the awardee does not identify the workplaces at the time of application, or upon award, if there is no application, the awardee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the awardee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the assistance agreement takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the assistance agreement, the awardee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Awardees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a awardee directly engaged in the performance of work under a grant or cooperative agreement, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant or cooperative agreement; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant or cooperative agreement and who are on the awardee's payroll. This definition does not include workers not on the payroll of the awardee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the awardee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Awardees Other Than Individuals)

A. The awardee certifies that it will or will continue to provide a drug-free workplace by:

- a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the awardee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- b. Establishing an ongoing drug-free awareness program to inform employees about --
 1. The dangers of drug abuse in the workplace;
 2. The awardee's policy of maintaining a drug-free workplace;
 3. Any available drug counseling, rehabilitation, and employee assistance programs; and
 4. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- c. Making it a requirement that each employee to be engaged in the performance of the grant or cooperative agreement be given a copy of the statement required by paragraph (a);
- d. Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant or cooperative agreement, the employee will --
 1. Abide by the terms of the statement; and
 2. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- e. Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant or cooperative agreement activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant or cooperative agreement;
- f. Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted --

1. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
2. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
3. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).
4. The awardee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant or cooperative agreement:

Place of Performance (Street address, city, county, state, zip code)

____ Check if there are workplaces on file that are not identified here.

B. Alternate II. (Awardees Who Are Individuals)

- a. The awardee certifies that, as a condition of the grant or cooperative agreement, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant or cooperative agreement;
- b. If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant or cooperative agreement activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant or cooperative agreement.

Attachment B

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

This certification is required by the Department of Homeland Security implementing Executive Orders 12549 and 12689, Debarment and Suspension.

Instructions for Certification

1. **By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.**
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal government, the department or agency may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4,

debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters--Primary Covered Transactions

1. The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - a. Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
 - b. Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - c. Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - d. Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transactions

1. Instructions for Certification

2. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
3. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
4. The prospective lower tier participant shall provide immediate written notice to the person to whom this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
6. The prospective lower tier participant agrees by submitting this proposal that, [[Page 33043]] should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
7. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled ``Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and No procurement Programs.
9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transactions

1. The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
2. Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Attachment C

Priority Population Descriptions

A. Refugees and Asylees

Who is a Refugee?

Under U.S. law, a refugee is a person who has fled his or her country of origin because of past persecution or a well-founded fear of persecution based upon race, religion, nationality, political opinion, or a membership in a particular social group. If the person is not in the United States, he or she may apply overseas for inclusion within the U.S. refugee program. If the person is already within the United States, he or she may apply for the U.S. asylum program.

This definition of a refugee does not include those people who have left their homes only to seek a more prosperous life. Such people are commonly referred to as "economic migrants," and are not refugees. People fleeing civil wars and natural disasters also may be ineligible for refugee resettlement under U.S. law, although they may fall within the protection of the United Nations High Commissioner for Refugees (UNHCR).

For additional information:

<http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnnextoid=a57476d52bd1e010VgnVCM1000000ecd190aRCRD>

B. Violence Against Women Act (VAWA)

Generally, U.S. citizens (USC) and Lawful Permanent Residents (LPRs) file an immigrant visa petition with the U.S. Citizenship and Immigration Services (USCIS) on behalf of a spouse or child, so that these family members may emigrate to or remain in the United States. USCIS Form I-130, Petition for Alien Relative is filed by the USC/LPR, the petitioner, on behalf of the family member who is the beneficiary. The petitioner controls when or if the petition is filed. Unfortunately, some U.S. citizens and LPRs misuse their control of this process to abuse their family members, or by threatening to report them to the USCIS. As a result, most battered immigrants are afraid to report the abuse to the police or other authorities.

Under the Violence Against Women Act (VAWA) passed by Congress in 1994, the spouses and children of United States citizens or lawful permanent residents (LPR) may **self-petition** to obtain lawful permanent residency. The immigration provisions of VAWA allow certain battered immigrants to file for immigration relief without the abuser's assistance or knowledge, in order to seek safety and independence from the abuser.

For additional information:

<http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnextoid=499a6c854523d010VgnVCM10000048f3d6a1RCRD>

C. “T” or “U” Nonimmigrant Status

The “T” nonimmigrant status, also known as the “T” visa, was created to provide immigration protection to victims of a severe form of human trafficking. The “U” nonimmigrant status, or “U” visa, is designated for victims of certain crimes who have suffered mental or physical abuse because of the crime and who are willing to assist law enforcement and government officials in the investigation of the criminal activity.

Congress created the “T” and “U” nonimmigrant classifications with passage of the Victims of Trafficking and Violence Protection Act in October 2000. The legislation was intended to strengthen the ability of law enforcement agencies to investigate and prosecute cases of domestic violence, sexual assault, trafficking of persons and other crimes while, at the same time, offering protection to victims of such crimes. The legislation also helps law enforcement agencies to better serve immigrant crime victims.

D. Special Immigrant Juvenile Visa Status

A Special Immigrant Juvenile is an immigrant:

- who is present in the US;
- has been declared dependent on a juvenile court located in the United States or whom such a court has legally committed to, or placed under the custody of, an agency or department of a State, or an individual or entity appointed by a state or juvenile court in the United States, and whose reunification with one or both of the immigrant’s parents is not viable due to abuse, neglect, abandonment, or a similar basis under state law;
- for whom it has been determined that it is not in their best interest to be returned to a country of origin;
- and in whose case the Secretary of DHS *consents* to the grant of SIJ status; except that no juvenile court has jurisdiction to determine the custody status or placement of a minor in the custody of the Secretary of Health and Human Services unless the Secretary of Health and Human Services *specifically consents* to such jurisdiction.

In addition, no natural parent or prior adoptive parent of any alien provided special immigrant juvenile status shall, by virtue of such parentage, be accorded any right, privilege, or status under the Immigration and Nationality Act (INA).

See INA 101(a)(27)(J)

Appendix B

On the following pages a portion CAGP2020 is attached (pp. 2-3).

government, encourage civic learning and build a strong foundation upon which immigrants can fully assimilate into society. Through preparing for naturalization, immigrants will gain the tools to become successful citizens and meet their responsibilities as United States citizens.

The goal of the Citizenship and Assimilation Grant Program is to expand the availability of high-quality citizenship preparation services for lawful permanent residents across the nation and to provide opportunities for lawful permanent residents to gain the knowledge and training necessary to assimilate into the fabric of American society.

Additional activities that support this goal include developing, identifying, and sharing best practices in citizenship preparation; increasing the use of and access to technology in citizenship preparation programs; working with local libraries and museums, which serve as vital resources for immigrant communities; and incorporating strategies to foster welcoming communities as part of the citizenship and civic assimilation process.

Furthermore, the goals of the Citizenship and Assimilation Grant Program address the DHS mission to Enforce and Administer Our Immigration Laws as stated in the 2014 Quadrennial Homeland Security Review as the program provides lawful permanent residents instruction on the rights and responsibility of U.S. citizenship and information and support on how to apply for naturalization within the authorized practice of immigration law.

Participation in E-Verify

As outlined in Appendix B and as a condition of receipt of funding under the award, grant recipients and sub-awardees must enroll (if not already enrolled) in E-Verify; use E-Verify to confirm employment eligibility of all new hires of the recipient who are working in the United States at hiring sites performing work under the program or activity funded in whole or in part under the award; and take steps as may be necessary to ensure award and sub award recipient compliance with the E-Verify requirements.

Certification under Student and Exchange Visitor Program (SEVP)

To be eligible for this program, applicants and proposed sub-awardees that are SEVP-certified organizations must be in compliance with all SEVP requirements at the time of application. Furthermore, grant recipients and sub-awardees that are SEVP-certified organizations must be in compliance with all SEVP requirements as a condition of receipt of funding and must comply with all SEVP requirements during the performance period. For more information on SEVP, please visit <https://www.ice.gov/sevp>.

Request for Proposals

In fiscal year (FY) 2020, a total of approximately \$8.2 million in federal funding is available for eligible organizations to provide direct citizenship preparation services to lawful permanent residents through this funding opportunity. USCIS anticipates awarding approximately 33 grants of up to \$250,000 each.

Proposed citizenship preparation activities **must** include the following two components:

1. **Citizenship instruction** to prepare lawful permanent residents for the naturalization test and interview. Program design must include:
 - a. Instruction in U.S. history and government for test preparation and the

- promotion of civic assimilation in English. Applications to provide instruction in languages other than English will be deemed ineligible;
- b. Activities that promote civic and linguistic assimilation;
 - c. English as a Second Language (ESL) instruction in reading, writing, and speaking;
 - d. Instruction on the naturalization process and eligibility interview;
 - e. The use of a nationally normed standardized test of English proficiency to place and assess progress of all students enrolled under this program. (Note: The Comprehensive Adult Student Assessment System (CASAS) citizenship test may not be used for this purpose as it is not a test of English language proficiency.) At least 80% of post-tested students must demonstrate educational gains as evidenced by increased standardized test scores;
 - f. The use of a current adult citizenship textbook that aligns with the skill level of the students in the class (published textbooks only, compilations of worksheets or handouts will not be accepted); all students must be issued a textbook for their own personal use;
 - g. A sample curriculum that includes all of the components contained in the USCIS Sample Curriculum found on the Citizenship Resource Center at www.uscis.gov/citizenship/educators/program-development including:
 - (1) Instruction in U.S. history and government for test preparation and the promotion of civic assimilation;
 - (2) Activities that promote civic and linguistic assimilation;
 - (3) English as a Second Language (ESL) instruction in reading, writing, and speaking for the naturalization test, naturalization process, and to conduct required assimilation activities; and
 - (4) Instruction on the eligibility interview (N-400);
 - h. The provision of at least 40 hours of citizenship instruction over a 10-12 week class cycle with managed enrollment to at least 200 students at the National Reporting System for Adult Education (NRS) low beginning to high intermediate levels; and
 - i. The use of citizenship teachers who have at least one year of experience teaching ESL to adults and who:
 - (1) Hold a degree in TESOL; and/or
 - (2) Hold TESOL certification from a state licensing agency; and/or
 - (3) Have a minimum of 2 years of experience in TESOL instruction in a classroom setting for a program that utilizes a textbook and a structured curriculum.

Classes offered at the NRS literacy level (1) or at the NRS advanced level (6) are not eligible for funding under this program. Classes offered in languages other than English are not eligible for funding under this program. Tutoring services do not count toward the minimum 40 hours of classroom instruction.

Grant-funded classes must integrate instruction in U.S. history and government; civics-based ESL instruction in reading, writing, and speaking; and instruction on the naturalization process and eligibility interview. For more detailed information on the content and competencies that applicants are required to address in grant-funded classes, please review the *Guide to the Adult Citizenship Education Content Standards and Foundation Skills* found at www.uscis.gov/sites/default/files/USCIS/Office_of_Citizenship/Citizenship_Resource_Center_Site/Publications/M-1121.pdf.